

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Company Name: Compudyne, Inc

Filing Date: March 26, 2026

Overview

Compudyne, Inc ("Company") is a non-facilities-based voice service reseller with fewer than 100,000 subscriber lines. As such, the Company is exempt from STIR/SHAKEN implementation obligations pursuant to 47 CFR § 64.6301(b). Notwithstanding this exemption, the Company is committed to taking reasonable and effective steps to mitigate illegal robocalls originating from or passing through its network.

Robocall Mitigation Measures

The Company has implemented the following measures as part of its robocall mitigation program:

1. Customer Vetting and Onboarding Controls

The Company conducts due diligence on all customers prior to providing voice services. This includes verifying the identity and intended use of service for all new customers, requiring customers to agree to terms of service that explicitly prohibit the use of the Company's services for illegal robocalling, spoofing, or any fraudulent communications activity.

2. Contractual Prohibitions

All customer agreements contain express prohibitions against the use of Company services to transmit illegal robocalls, spoofed calls, or any calls that violate the Telephone Consumer Protection Act (TCPA), Truth in Caller ID Act, or any applicable federal or state law.

3. Traffic Monitoring

The Company monitors call traffic patterns for anomalies that may indicate illegal robocall activity, including unusual call volumes, high call failure rates, or patterns consistent with auto-dialed or pre-recorded message campaigns.

4. Response to Traceback Requests

The Company cooperates fully with the USTelecom Industry Traceback Group and responds promptly to all traceback requests in accordance with FCC rules and industry standards. The Company maintains records sufficient to support traceback investigations.

5. Upstream Provider Reliance

As a non-facilities-based reseller, the Company transmits calls through upstream providers who are subject to STIR/SHAKEN obligations. The Company relies on these upstream providers to authenticate calls where required, and selects upstream providers who are in compliance with applicable FCC rules.

6. Customer Complaint Handling

The Company maintains a process for receiving and responding to complaints related to unwanted or illegal calls. Complaints are investigated promptly and, where a customer is found to be using services for illegal robocalling, the Company will take appropriate action up to and including termination of service.

7. Employee Awareness

Relevant staff are made aware of robocall mitigation obligations and the Company's policies prohibiting the facilitation of illegal robocall traffic.

Contact Information

For questions regarding this Robocall Mitigation Program, please contact:

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Certification

The Company certifies that the information contained in this Robocall Mitigation Program Description is accurate and that the Company is committed to implementing and maintaining the measures described herein.

Ryan Goldberg

Director of Technology Innovation, Compudyne, Inc

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