



**FIT Technologies LLC
Robocall Mitigation
Plan March 31, 2026**

FIT Technologies LLC (“FIT”) submits this Robocall Mitigation Plan (“Plan”) pursuant to 47 C.F.R. § 64.6305.

FIT is an Ohio-based managed IT and cybersecurity services provider that partners with organizations to deliver proactive IT management, cybersecurity solutions, and strategic technology guidance that improve efficiency, security, and productivity. FIT serves a diversified client base across multiple industries, with a strong focus in K-12 education and small and midsize organizations that rely on technology as a critical business enabler.

FIT offers its clients a range of communications and IT services, including resold, white-labeled VoIP and analog voice services. For the majority of its voice customers, FIT resells AT&T VoIP and analog voice services; FIT also resells Cincinnati Bell analog voice services to a few customers (AT&T and Cincinnati Bell, collectively, the “Wholesale Partners”). FIT does not control the infrastructure, maintenance or technical development of the underlying network(s) it uses to provide these voice services. Accordingly, while FIT acts as a Voice Service Provider, it does not have a STIR/SHAKEN obligation because it lacks control over the infrastructure necessary to implement STIR/SHAKEN. The Wholesale Partners each appear in the Robocall Mitigation Database (“RMD”) and have reported that they are STIR/SHAKEN compliant and have implemented robocall mitigation programs for their operations.

FIT supports the FCC’s efforts to reduce illegal robocalls on U.S. networks and protect Americans, it is thus committed to implementing an effective robocall mitigation plan in accordance with Commission policies. Accordingly, this Plan describes the specific reasonable steps FIT takes to avoid originating or processing illegal robocall traffic. All FIT traffic is subject to this Plan. FIT believes that these practices can reasonably be expected to significantly reduce the carrying or processing of illegal robocalls. FIT also engages in periodic internal reviews to evaluate the effectiveness of its robocall mitigation practices and identify and implement updates to these procedures as necessary.

1. “Know Your Customer” Policies and Contractual Provisions

FIT’s targeted customer base is primarily educational organizations in the state of Ohio, which establishes a narrow and intimate potential customer pool. Further, the vast majority of FIT’s education clients are E-Rate partners that have already undergone USAC verification to participate in the program. Nonetheless, FIT has developed “know your customer” (“KYC”) policies for FIT customers in an effort to prevent the origination of illegal calls and in accordance with 47 C.F.R. § 64.1200(n)(4). These policies help support the company’s investigation of its customers, such as by requiring submission of supporting records to verify customer identity, or other confirmations, which may include:

- Federal employer identification number or business registration number;

- active telephone number;
- type of goods or services offered;
- verification of commercial presence, if applicable;
- verification and/or site visit to physical campus address;
- verification of E-Rate status, if applicable; and
- other identifying documentation that may be appropriate for the type of customer.

In addition to FIT's E-Rate customers being subject to the E-Rate acceptable use requirements, where applicable, [BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [END
CONFIDENTIAL].

2. "Know Your Upstream Provider" Policies and Contractual Provisions

As referenced herein, FIT has confirmed that its Wholesale Partners are registered in the Robocall Mitigation Database and each has certified that it has (1) implemented STIR/SHAKEN on the IP portion of its network in compliance with the FCC's rules; and (2) implemented a robocall mitigation program.¹ FIT has also confirmed that its Wholesale Partners each have implemented additional contractual protections in their agreements with other service providers and adopted policies aimed at tracing and stopping illegal robocalls originating on other service providers' networks.

Each Wholesale Partner has identified its Acceptable Use Policy and that its contracts preserve the Wholesale Partner's ability to terminate a customer for non-compliance of this policy. [BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] [END CONFIDENTIAL].

3. Traffic Monitoring and Analysis; Call Blocking

FIT cooperates with its Wholesale Partners to monitor traffic, investigate suspicious activity, and to suspend or terminate service if appropriate. For instance, if a Wholesale Partner or a third party were to identify suspicious activity associated with a certain line that was being resold by FIT, then FIT would work with the provider to identify the source of that suspicious activity, in accordance with the FCC's rules and the Communications Act of 1934, as amended.

In their respective RMD filings, FIT's Wholesale Partners describe the various measures

¹ See, e.g., RMD 0021840798 (AT&T Mobility Services LLC, providing a Robocall Mitigation Plan for AT&T Services, Inc. and its voice service affiliates); RMD 0003018033 (Cincinnati Bell Inc.).

taken by each company to monitor traffic, conduct analysis and block unlawful traffic in accordance with the FCC's rules. As a reseller of the voice services provided by these partners, FIT is fortunate to share the benefit of these robust solutions. For instance, AT&T reports that it has developed internal measures to identify suspect calls based on proprietary and public data sources, and has internal teams dedicated to investigating call patterns and identifying trends in robocalls. AT&T also utilizes third parties such as Hiya and TransUnion for certain analytics systems used to enable call blocking capabilities, protection against spoofed calls, and verified caller ID solutions.² In addition, Cincinnati Bell reports it uses a third party (TNS Call Guardian) for its call analytics and has developed internal processes for prompt robocall investigations. Because FIT does not own or control any of the network infrastructure or technology, it relies on the policies and systems of its Wholesale Partners for technical mitigation and blocking capabilities.

4. STIR/SHAKEN Implementation

FIT is a reseller and relies on its Wholesale Partners for access to their networks for voice call capability. As such, FIT "lacks control of the network infrastructure necessary to implement STIR/SHAKEN"³ and is considered by the FCC to be a provider "without" a STIR/SHAKEN implementation obligation.⁴ The Wholesale Partners have each registered in the Robocall Mitigation Database and each certify to STIR/SHAKEN implementation on the IP portions of its network.⁵

5. Traceback Commitment

In accordance with 47 C.F.R. §64.1200(n)(1), FIT is committed to responding fully and within twenty-four (24) hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperating with the FCC, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use FIT's service for illegal calls. FIT also cooperates with its Wholesale Partners, where appropriate, to respond to traceback requests.

6. FIT Principals, Affiliates, Subsidiaries and Parent Companies

FIT Technologies LLC is 100% owned by FIT Technologies, Inc, which is 100% employee-owned via an employee stock ownership plan (ESOP): *FIT Technologies, Inc. Employee Stock Ownership Trust*

FIT's leadership and Board of Directors can be found here:

² See RMD 0021840798 (AT&T Mobility Services LLC).

³ 35 FCC Rcd. 3241, 3260, para. 40.

⁴ 38 FCC Rcd. 2573, 2592, n. 137 ("When referencing those providers 'without' a STIR/SHAKEN implementation obligation, we mean those providers . . . that lack control over the facilities necessary to implement STIR/SHAKEN.").

⁵ *Supra* n. 1.

<https://www.fittechnologies.com/our-story/leadership/>

FIT does not have any affiliates, subsidiaries, or parent companies other than described above.