

Digital Rakes LLC

Robocall Mitigation Program Description

Prepared for FCC Robocall Mitigation Database filing

1. Company and service description

Digital Rakes LLC is a Michigan limited liability company that provides customer-facing voice services to business end users. Its offerings include hosted PBX and related business voice services. Digital Rakes LLC serves end-user customers and relies on upstream voice providers and carriers, including VoxTelesys and Flowroute, for underlying call transport and network functions associated with the origination and termination of calls on the public switched telephone network.

2. STIR/SHAKEN implementation posture

Digital Rakes LLC does not control the network infrastructure necessary to implement the STIR/SHAKEN authentication framework on calls originated using its services. Digital Rakes LLC therefore files as a voice service provider without a STIR/SHAKEN implementation obligation and relies on upstream carriers and service providers, including VoxTelesys and Flowroute, for underlying network infrastructure and caller ID authentication functions where applicable.

3. Know-your-customer and onboarding controls

Before activating service, Digital Rakes LLC uses commercially reasonable steps to vet customers and their intended use of service. These steps may include collecting business identity and contact information, reviewing the requested service profile, confirming the customer's intended use case, evaluating whether the requested service or traffic pattern appears consistent with a legitimate business purpose, and declining, delaying, or escalating activation when information is incomplete, suspicious, or inconsistent.

Digital Rakes LLC is focused on business customers and does not knowingly provision service for unlawful robocalling, spoofing, traffic pumping, phishing, or any activity that violates applicable law, FCC rules, or carrier requirements.

4. Robocall mitigation and abuse prevention

Digital Rakes LLC maintains a robocall mitigation program designed to take reasonable steps to avoid originating illegal robocall traffic. The company prohibits spoofing, unlawful robocalls, fraudulent traffic, and use of its services in violation of applicable consent, telemarketing, or messaging rules. The company reviews reports of suspicious traffic or abuse, cooperates with upstream providers and traceback partners, and may suspend, restrict, or terminate service where misuse is identified or reasonably suspected.

Digital Rakes LLC responds to traceback requests and regulatory or law-enforcement inquiries as required and maintains internal procedures for escalation, investigation, and coordination with upstream providers where appropriate.

5. Recordkeeping and review

Digital Rakes LLC maintains internal policies and procedures relating to customer vetting, acceptable use, abuse response, and robocall mitigation. The company periodically reviews these procedures and updates them as needed to reflect changes in its services, vendors, operations, or legal obligations.

6. Contact and responsibility

The responsible officer and robocall mitigation contact for this filing is Robert McKeever II, Managing Member, Digital Rakes LLC.

Digital Rakes LLC submits this robocall mitigation program description in support of its Robocall Mitigation Database filing as a voice service provider without a STIR/SHAKEN implementation obligation.

Note: This document is intended to accompany the FCC Robocall Mitigation Database filing and should be kept consistent with the company's internal robocall mitigation and acceptable use procedures.