

TECHNOLOGY HILL LLC Robocall Mitigation Plan & Certification

FCC Compliance Filing Pursuant to 47 C.F.R. § 64.6305

I. Certification Statement

TECHNOLOGY HILL LLC hereby certifies to the Federal Communications Commission (FCC) the following:

1. We have fully implemented and maintain a robocall mitigation program that complies with all requirements set forth in 47 C.F.R. § 64.6305. This program applies to all voice traffic originating from, terminating on, or transiting our network.
 2. Neither TECHNOLOGY HILL LLC nor any affiliate under common ownership or control has been found in violation of any FCC rule, law enforcement directive, or regulatory order related to illegal robocalling, caller ID spoofing, or robocall mitigation obligations.
 3. This plan is filed by a voice service provider operating under a valid extension for full STIR/SHAKEN implementation, as permitted under 47 C.F.R. § 64.6304. We remain compliant with all conditions associated with such extension.
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II. STIR/SHAKEN Status & Caller ID Authentication

a. Implementation Status:

As a provider with fewer than 100,000 subscriber lines, TECHNOLOGY HILL LLC operates under a current STIR/SHAKEN implementation extension. We are actively taking reasonable steps to implement the framework and will achieve full compliance no later than the deadline applicable to our extension.

b. Alternative Robocall Mitigation:

During this extension period, we maintain a robust, documented robocall mitigation program (as detailed herein) to actively prevent illegal robocall traffic from originating, transiting, or terminating on our network.

c. Caller ID Validation & Spoofing Prevention:

We enforce strict policies requiring all subscribers to use only telephone numbers assigned by TECHNOLOGY HILL LLC or explicitly authorized in writing. We deploy third-party analytics and, where applicable, partner solutions (e.g., Aureon's Caller ID Authentication (CIDA) with Outbound Shield) to monitor, flag, and block calls originating from invalid, unallocated, unauthenticated, or suspected spoofed numbers.

III. Know Your Customer (KYC) & Customer Due Diligence

a. Subscriber Verification:

Prior to onboarding, we perform identity verification and collect a legitimate physical service address for all new residential, retail, and wholesale subscribers.

b. Enhanced Due Diligence for High-Risk Customers:

Customers identified as higher risk (e.g., outbound call centers, high-volume originators, resellers) undergo enhanced application review, including business validation, and are subject to ongoing, real-time monitoring for anomalous calling patterns.

c. Upstream & Downstream Provider Vetting:

We contract only with intermediate and upstream providers that are duly registered in the FCC's Robocall Mitigation Database. We collect, verify, and retain basic business information from all carrier partners prior to enabling traffic exchange.

IV. Network Monitoring & Illegal Traffic Mitigation

a. Real-Time Traffic Analysis:

We employ automated systems to monitor outbound and inbound call traffic in real time for patterns indicative of illegal robocalling, including but not limited to:

- Excessive call volume spikes
- Abnormally short call durations
- High call blocking or answer seizure ratios
- Consumer complaint trends (e.g., FCC complaints, industry consortium data)

b. Mitigation Actions:

Upon detection of suspicious activity, we initiate immediate investigation. Confirmed illegal robocall traffic results in prompt and decisive action, including but not limited to:

- Suspension or termination of the offending subscriber or carrier account
- Blocking of traffic from non-compliant upstream providers
- Notification to law enforcement or the FCC as appropriate

All such actions are taken in accordance with our contractual terms and applicable law.

V. Traceback Cooperation & 24-Hour Response Commitment

a. Designated 24/7 Point of Contact:

TECHNOLOGY HILL LLC maintains a dedicated, 24-hour-per-day, 7-day-per-week point of contact for traceback requests. The following information is accurately registered and kept current in the FCC's Robocall Mitigation Database (per 47 C.F.R. § 64.6305(d)(4)(v)):

- Contact Name
- Title
- Physical Address
- Telephone Number (24/7 reachable)
- Email Address (monitored continuously)

b. Mandatory 24-Hour Response to Tracebacks:

TECHNOLOGY HILL LLC commits to fully responding to all traceback requests from the FCC, law enforcement, and the registered traceback consortium (e.g., USTelecom's Traceback Consortium) **within 24 hours of receipt**. A complete response includes, at a minimum:

- Identification of the originating subscriber or upstream provider
- Call detail records sufficient to trace the traffic
- Confirmation of any mitigation actions taken

Failure to respond within 24 hours will be treated as a violation of this plan and reported as required by FCC rules.

c. Full Cooperation:

We will cooperate fully in all traceback investigations, including preserving evidence, providing authenticated call data, and assisting enforcement actions as requested.

VI. Contractual Enforcement & Penalties

All subscriber, reseller, and carrier agreements contain legally enforceable provisions that:

- Explicitly prohibit the origination, transit, or termination of illegal robocalls and caller ID spoofing.
- Require full, time-sensitive cooperation with traceback investigations (including 24-hour response obligations).

- Grant TECHNOLOGY HILL LLC the right to immediately suspend or terminate service for any violation of these provisions or FCC robocall rules.
 - Impose financial penalties or service-level remedies for repeat or willful violations, to the extent permitted by law.
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VII. Ongoing Compliance & Plan Review

TECHNOLOGY HILL LLC is committed to protecting consumers and maintaining the integrity of its network. We will:

- Review and update this robocall mitigation plan at least annually or promptly following material changes to our operations or FCC rules.
- Conduct internal audits of our KYC, monitoring, and traceback response processes.
- Train relevant personnel on traceback handling and 24-hour response obligations.
- Maintain compliance with the TRACED Act and all evolving FCC regulations governing robocall mitigation.