

Robocall Mitigation Program Description The filing entity does not operate a facilities-based voice network and does not directly originate calls over the public switched telephone network (PSTN). As such, the entity is not subject to the STIR/SHAKEN implementation requirements under 47 CFR § 64.6301. All voice traffic associated with the filing entity is transmitted through third-party providers, including Twilio and SkySwitch. These providers are responsible for implementing STIR/SHAKEN authentication and ensuring compliance with applicable FCC regulations. The filing entity does not originate unsolicited robocalls. All communications are either transactional, user-initiated, or conducted with prior consent. The entity maintains internal policies and controls to prevent misuse of its platform for illegal robocalling or spoofing activities. In the event of any suspected misuse, the filing entity will take immediate action, including suspension or termination of access, and will cooperate fully with law enforcement agencies, the Federal Communications Commission, and the Industry Traceback Group. The filing entity commits to responding to all traceback requests within 24 hours and will provide all relevant information necessary to assist in identifying and mitigating illegal robocall traffic. This mitigation program is designed to ensure compliance with FCC requirements while leveraging trusted third-party providers for network-level voice services and authentication.