

Robocall Mitigation Program Description

Agilitec IT, LLC

1. Filer Information

Legal Entity Name: Agilitec IT, LLC

Business Address: 7995 Blue Diamond STE 102-198, Las Vegas NV 89178

FCC Registration Number (FRN): 0038333720

Date of Filing: 04/22/2026

2. Robocall Mitigation Contact

The following individual is designated as responsible for addressing robocall mitigation-related issues, including responding to traceback requests from the Commission, law enforcement, and the industry traceback consortium:

Name: Brian Ellis

Title: Chief Technology Officer

Department: Executive

Business Address: 7995 Blue Diamond STE 102-198, Las Vegas NV 89178

Telephone: 7027201700

Email: support@agilitec.com

3. Description of Business and Role in the Call Chain

Agilitec IT, LLC ("Agilitec") is a Managed Service Provider headquartered in Las Vegas, Nevada. Agilitec resells hosted voice-over-IP (VoIP) communications services to business end users as part of its managed IT service offerings. Agilitec operates as a non-facilities-based voice service provider: it does not own, operate, or control the underlying switching, signaling, or transport network infrastructure used to originate, carry, or terminate voice traffic.

All voice traffic furnished to Agilitec's end users is originated on the network of Agilitec's upstream facilities-based voice service provider, which performs STIR/SHAKEN authentication of originating calls using its own Service Provider Code (SPC) token and digital certificate obtained from a STIR/SHAKEN Certificate Authority. Agilitec's role in the call chain is limited to (i) reselling voice service to end users, (ii) provisioning telephone numbers to end users through its upstream provider's platform, and (iii) providing end-user support, billing, and account administration.

4. STIR/SHAKEN Implementation Status

Agilitec does not have a STIR/SHAKEN implementation obligation under 47 CFR § 64.6302(a). Because Agilitec does not own, operate, or control the network infrastructure necessary to implement STIR/SHAKEN (including session border controllers, call signaling platforms, or

certificate authority relationships), it is not a provider to which the implementation obligation attaches. This position is consistent with the FCC's Eighth Report and Order on Call Authentication Trust Anchor (FCC 24-119, November 21, 2024), which recognizes that the STIR/SHAKEN implementation obligation applies to providers with control over the network infrastructure necessary to implement the framework.

STIR/SHAKEN authentication of calls originated on behalf of Agilitec's end users is performed by Agilitec's upstream facilities-based voice service provider, which is obligated to implement and maintain the framework.

5. Reasonable Steps to Avoid Originating Illegal Robocall Traffic

Agilitec has implemented the following reasonable steps, consistent with 47 CFR § 64.6305(a), to avoid originating, carrying, or processing illegal robocall traffic:

5.1 Know-Your-Customer (KYC) Procedures

Agilitec provisions voice service exclusively to known, vetted business clients under written managed services agreements. Before any telephone number or voice seat is provisioned, Agilitec performs the following customer due diligence:

- Verification of the prospective client's legal business entity, including confirmation of state business registration and, where applicable, Federal Employer Identification Number (EIN);
- Identification of the client's physical business address and verification against independent sources;
- Identification and verification of an authorized signatory or responsible party for the account;
- Review of the prospective client's stated use case for voice service to confirm that it is consistent with ordinary business communications and not high-volume outbound calling, telemarketing campaigns, or other use cases that present elevated robocall risk;
- Execution of a written services agreement that incorporates Agilitec's Acceptable Use Policy.

Agilitec does not provision voice service to anonymous customers, prepaid or self-service sign-ups, or entities whose business purpose cannot be verified.

5.2 Acceptable Use Policy

All voice service clients are contractually bound to an Acceptable Use Policy that prohibits, among other things:

- The origination of any call that violates the Telephone Consumer Protection Act (TCPA), 47 U.S.C. § 227, or its implementing regulations;
- The origination of calls using spoofed, false, or misleading caller identification information with intent to defraud, cause harm, or wrongfully obtain anything of value, in violation of the Truth in Caller ID Act;
- The origination of high-volume automated calls, prerecorded or artificial voice messages, or autodialed calls to residential or wireless subscribers without prior express consent as required by law;

- The use of Agilitec's services to facilitate fraud, scams, phishing, or any other unlawful activity.

Violation of the Acceptable Use Policy is grounds for immediate suspension or termination of service.

5.3 Traffic Pattern Monitoring

Agilitec leverages call detail records and platform analytics made available by its upstream facilities-based provider to monitor for anomalous outbound calling patterns that may indicate illegal robocall activity, including:

- Unusual spikes in outbound call volume inconsistent with a client's historical usage profile or stated business use case;
- High rates of short-duration calls, which may indicate automated dialing activity;
- Elevated rates of uncompleted or rejected calls;
- Outbound calling to geographies or number ranges inconsistent with the client's business.

When anomalous activity is identified, Agilitec investigates, contacts the client to verify legitimacy, and takes appropriate corrective action up to and including suspension of service.

5.4 Response to Traceback Requests

Agilitec commits to respond fully and within 24 hours to all traceback requests received from the Federal Communications Commission, law enforcement agencies, and the industry traceback consortium selected by the Commission pursuant to 47 CFR § 64.1203 (currently USTelecom's Industry Traceback Group). The designated contact identified in Section 2 of this document is responsible for receiving and responding to all such requests.

Traceback responses include all information reasonably available to Agilitec concerning the call in question, including the end-user account associated with the originating telephone number, the date and time of the call, and any other information requested by the traceback initiator.

5.5 Cooperation with Law Enforcement and the Commission

Agilitec will cooperate fully with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocaller that uses Agilitec's service to originate calls. Cooperation includes providing information responsive to lawful requests, taking enforcement action against clients identified as originating illegal robocall traffic, and implementing any additional mitigation measures that may be reasonably requested.

5.6 Enforcement and Client Termination

Upon confirmation that a client has originated illegal robocall traffic or otherwise violated the Acceptable Use Policy, Agilitec will take one or more of the following actions, as appropriate to the severity of the violation:

- Written notice to the client requiring immediate cessation of the offending activity;
- Temporary suspension of voice service pending investigation;
- Permanent termination of voice service and deprovisioning of telephone numbers;
- Referral of information concerning the violation to the Commission, law enforcement, and the industry traceback consortium.

5.7 Upstream Provider Coordination

Agilitec relies on its upstream facilities-based voice service provider for STIR/SHAKEN authentication, network-level call analytics, and carrier-grade traffic monitoring. Agilitec maintains an active relationship with its upstream provider's compliance and abuse teams and promptly escalates suspected illegal robocall activity to the upstream provider for coordinated investigation and mitigation.

6. Program Review and Updates

Agilitec reviews this Robocall Mitigation Program at least annually and updates it as necessary to reflect changes in applicable law, Commission rules, business operations, or the identification of additional reasonable mitigation measures. Agilitec will update its Robocall Mitigation Database filing within 10 business days of any material change to the information required under 47 CFR § 64.6305(d).

7. Certification

Agilitec IT, LLC certifies that (i) all calls that it originates on its network are subject to the robocall mitigation program described in this document, consistent with 47 CFR § 64.6305(a); (ii) Agilitec has not had any prior Robocall Mitigation Database certification removed by Commission action and has not been prohibited from filing in the Robocall Mitigation Database; and (iii) the information provided in this document and in Agilitec's associated Robocall Mitigation Database filing is true and accurate to the best of the filer's knowledge.



Brian Ellis, Chief Technology Officer

Agilitec IT, LLC

Date: 4/22/2026