

Robocall Mitigation Program Description

Company Name: EMERALD COMMUNITIES CORP

FCC Registration Number (FRN): 0038410775

Business Address: 501 South Flagler Drive, Suite 309, West Palm Beach, FL 33401

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1. Purpose

EMERALD COMMUNITIES CORP is committed to preventing illegal robocalls, caller ID spoofing, and fraudulent telecommunications traffic across its voice network. This Robocall Mitigation Program is implemented to comply with FCC regulations, STIR/SHAKEN obligations, and industry best practices.

2. STIR/SHAKEN Implementation

The company has implemented STIR/SHAKEN authentication procedures on all applicable IP-based voice traffic originating on its network. Calls are authenticated and signed in accordance with FCC requirements where technically feasible.

3. Traffic Monitoring and Mitigation

The company actively monitors voice traffic patterns for suspicious activity, unusual call volumes, invalid numbering behavior, spoofing indicators, and other signs of illegal robocall activity. Automated systems and manual reviews are used to identify and block suspicious traffic.

4. Customer Verification Procedures

All customers are subject to verification procedures prior to activation of voice services. Verification may include business identity checks, KYC reviews, service validation, billing verification, and fraud-risk assessments.

5. Traceback Cooperation

EMERALD COMMUNITIES CORP cooperates fully with traceback requests from the FCC, law enforcement agencies, and authorized industry traceback consortiums. The company responds to traceback inquiries within required timelines and maintains relevant records to support investigations.

6. Know Your Upstream and Downstream Providers

The company evaluates upstream carriers, customers, and partners before interconnection and continuously reviews traffic sources to minimize the risk of illegal robocall traffic entering or exiting its network.

7. Record Retention

Relevant traffic logs, customer records, traceback requests, and mitigation actions are retained in accordance with applicable laws and operational requirements to support compliance and investigations.

8. Enforcement and Suspension

The company reserves the right to suspend, restrict, or terminate services associated with suspected illegal robocalling, spoofing, or fraudulent telecommunications activity without prior notice when necessary to protect network integrity and comply with regulatory obligations.

9. Continuous Improvement

The Robocall Mitigation Program is periodically reviewed and updated to align with evolving FCC regulations, industry standards, and emerging fraud prevention practices.

Certification

I certify under penalty of perjury under the laws of the United States of America that the information contained in this Robocall Mitigation Program Description is true and accurate to the best of my knowledge and that EMERALD COMMUNITIES CORP maintains procedures reasonably designed to prevent the origination and transmission of illegal robocalls.

Authorized Officer Signature	Date
Alicia Fernandez	05/12/2026