

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Christopher Green LLC (d/b/a Titan Dialer)
FCC Registration Number (FRN): 0038414272
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Christopher Green LLC, doing business as Titan Dialer (the "Company"), is a multi-tenant cloud contact-center platform that originates voice traffic through SignalWire, Inc., a Tier-1 voice service provider with full A-level STIR/SHAKEN attestation. The Company submits this Robocall Mitigation Program Description pursuant to 47 C.F.R. § 64.6305 and the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act.

The Company's robocall mitigation framework consists of the following controls:

1. STIR/SHAKEN Attestation

All outbound calls originated through the Company's platform receive A-level STIR/SHAKEN attestation through our upstream provider SignalWire, Inc. The Company does not originate or transit any voice traffic outside of this attested path. Toll-free outbound caller ID is blocked at the Company's application layer to prevent attestation downgrade. The Company does not operate any non-IP voice infrastructure.

2. Customer Due Diligence (Know-Your-Customer)

Every business tenant onboarded to the Company's platform completes mandatory Know-Your-Customer (KYC) verification before activation. KYC includes (a) verification of legal business identity through formation documents and Employer Identification Number; (b) owner identity verification via government-issued photo identification; (c) verification of business address; and (d) a written declaration of intended service use including affirmative TCPA acknowledgment. KYC records are retained for the duration of the customer relationship plus a minimum of two years thereafter.

3. Caller-ID and Number-Use Controls

Outbound caller ID for tenant calls is dynamically restricted by the Company's platform to active local Direct Inward Dial (DID) numbers owned and verified by the originating tenant. Tenants cannot spoof, substitute, or override caller ID values. Toll-free outbound dialing is technically blocked at the application layer. Number ownership is verified at the time of DID assignment and reverified at intervals not to exceed 90 days.

4. TCPA Time-Window Enforcement

The Company's platform automatically enforces calling-time restrictions of 8:00 AM to 9:00 PM local time per the called party's time zone on all outbound dialing. Time zone is derived from the called number's NPA-NXX. Tenants cannot override or disable these restrictions through the platform user interface or any application programming interface.

5. Do-Not-Call Compliance

All outbound calling traffic is scrubbed against the National Do Not Call Registry on a daily automated basis. The Company maintains a current Subscription Account Number (SAN) where required for tenants engaged in telemarketing. Tenant-maintained internal do-not-call lists are honored in real time at the platform layer.

6. Recording-Disclosure Compliance

Where call recording is enabled by a tenant, automated disclosure prompts are played to all

inbound callers in compliance with two-party-consent jurisdictions. Recording disclosure language is reviewed annually for regulatory alignment.

7. Traffic-Pattern Monitoring

The Company's platform continuously monitors outbound traffic for anomalous patterns indicative of illegal robocalling, including high-velocity dialing, abnormal ratios of short-duration calls, sudden geographic dispersion of called numbers, and complaint-rate spikes. Suspicious tenants are automatically rate-limited or suspended pending human review.

8. Complaint Handling and Bad-Actor Termination

Complaints received about calls originated through the Company's platform are investigated within one business day. Tenants confirmed to be originating illegal robocalls or making unconsented telemarketing calls are immediately suspended and, if violations are substantiated, terminated. The Company notifies its upstream provider and, where appropriate, the Industry Traceback Group (ITG) regarding confirmed bad actors.

9. Traceback Cooperation

The Company maintains Call Detail Records (CDRs) for a minimum of 24 months and responds to lawful subpoenas and Industry Traceback Group requests within the timeframes required by ITG protocol. The Company maintains a designated point of contact for traceback inquiries available at the contact address provided in this filing.

10. Annual Review

This Robocall Mitigation Program Description is reviewed and updated annually, and upon any material change to the Company's service offering, customer profile, or upstream carrier relationships. The Company will submit an updated filing to the Robocall Mitigation Database whenever required by 47 C.F.R. § 64.6305(b)(3).

Designated Point of Contact for Mitigation-Related Inquiries

Christopher Green, Owner
Christopher Green LLC (d/b/a Titan Dialer)
1107 53rd Street, Kenosha, WI 53140
Email: admin@titandialer.com
Telephone: (217) 551-9904

CERTIFICATION

I, Christopher Green, declare under penalty of perjury that the foregoing Robocall Mitigation Program Description is true and correct, that I am authorized to file it on behalf of Christopher Green LLC, and that Christopher Green LLC has implemented the controls described herein.

Signature: _____

Christopher Green, Owner
Christopher Green LLC
Date: May 13, 2026