



Robocall Mitigation Plan

M J Harper Holdings LLC d/b/a Rykden Technology Solutions

FCC Robocall Mitigation Program Description

For Providers Without a STIR/SHAKEN Implementation Obligation

Effective 2026

Company Name: M J Harper Holdings LLC

DBA: Rykden Technology Solutions

Effective Date: May 29, 2026

1. Purpose

M J Harper Holdings LLC d/b/a Rykden Technology Solutions (“Rykden Technology Solutions”) maintains this Robocall Mitigation Plan in compliance with applicable Federal Communications Commission (“FCC”) regulations governing illegal robocall prevention, traceback cooperation, and Robocall Mitigation Database (“RMD”) certifications under 47 C.F.R. § 64.6305.

Rykden Technology Solutions certifies that it:

- Has implemented a robocall mitigation program reasonably designed to prevent the origination, transmission, or facilitation of illegal robocall traffic;
- Responds promptly to traceback requests;
- Cooperates with law enforcement and industry traceback efforts; and
- Maintains policies and procedures intended to identify and mitigate suspicious calling activity.

Rykden Technology Solutions does **not** have a current STIR/SHAKEN implementation obligation because it does not control the network infrastructure necessary to implement STIR/SHAKEN authentication directly.

2. Regulatory Basis

This mitigation plan is designed to satisfy FCC robocall mitigation obligations applicable in 2026, including:

- 47 C.F.R. § 64.6305;
- FCC Robocall Mitigation Database requirements;
- FCC enforcement advisories and annual recertification requirements effective February 2026; and
- Applicable traceback cooperation standards.

Rykden Technology Solutions understands that voice providers must maintain accurate and updated RMD filings and update material changes within ten (10) business days.

3. Company Operations

Rykden Technology Solutions operates as a telecommunications and technology services entity utilizing third-party upstream carriers and interconnected voice service providers.

Rykden Technology Solutions:

- Does not own or operate underlying PSTN switching infrastructure;
 - Does not independently issue STIR/SHAKEN certificates;
 - Relies upon upstream network providers for authentication functions where applicable; and
 - Maintains customer and traffic monitoring procedures intended to reduce illegal robocall activity.
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4. STIR/SHAKEN Status

Rykden Technology Solutions is a provider **without a STIR/SHAKEN implementation obligation** because it does not control the SIP network infrastructure required to independently authenticate calls.

Where technically available, calls transmitted through upstream providers may receive STIR/SHAKEN attestation from those upstream carriers.

Rykden Technology Solutions nevertheless maintains robocall mitigation procedures consistent with FCC requirements applicable to providers operating without direct STIR/SHAKEN capability.

5. Robocall Mitigation Program

Rykden Technology Solutions implements the following robocall mitigation measures:

A. Customer Vetting and Know-Your-Customer (KYC)

Prior to service activation, the company may collect and verify:

- Customer legal name;
- Business registration documentation;
- Physical address;
- Government-issued identification where appropriate;
- Tax identification information;
- Billing information; and
- Intended use of telecommunications services.

Accounts determined to present elevated fraud risk may be denied service.

B. Traffic Monitoring

Rykden Technology Solutions monitors for suspicious traffic patterns including:

- Unusually high outbound call volumes;
- Short-duration calls indicative of robocalling;
- Sequential dialing patterns;
- Invalid or spoofed caller ID usage;
- Excessive call failures;
- Traffic spikes inconsistent with stated business operations; and
- Calls associated with consumer complaints or traceback requests.

Traffic determined to be suspicious may be blocked, suspended, rate-limited, or investigated.

C. Caller ID Policies

Rykden Technology Solutions prohibits:

- Illegal caller ID spoofing;

- Transmission of invalid numbers;
- Use of unassigned NANP numbers;
- Fraudulent impersonation activity; and
- Misleading caller identification information.

Customers are required to use only authorized caller IDs associated with their business or services.

D. Traceback Cooperation

Rykden Technology Solutions commits to:

- Responding to traceback requests within twenty-four (24) hours whenever feasible;
 - Cooperating with the FCC, law enforcement agencies, and the Industry Traceback Group;
 - Preserving relevant records as legally required; and
 - Taking mitigation action against customers involved in unlawful robocalling activity.
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E. Complaint Investigation

Consumer complaints or carrier notices regarding suspicious traffic are investigated promptly.

Corrective actions may include:

- Warning notices;
 - Enhanced monitoring;
 - Temporary suspension;
 - Permanent account termination; or
 - Referral to law enforcement authorities.
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F. Record Retention

Rykden Technology Solutions maintains records related to:

- Customer onboarding;
- Traffic monitoring;

- Complaints;
- Mitigation actions; and
- Traceback responses

for a commercially reasonable retention period consistent with applicable law and operational requirements.

6. Upstream Provider Coordination

Rykden Technology Solutions works with upstream voice providers and carriers to:

- Ensure lawful traffic handling;
 - Maintain compliance with robocall mitigation obligations;
 - Investigate suspicious activity; and
 - Support traceback and enforcement actions when necessary.
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7. Employee Compliance and Training

Relevant personnel receive training regarding:

- FCC robocall mitigation requirements;
 - Illegal robocall indicators;
 - Caller ID spoofing prohibitions;
 - Escalation procedures; and
 - Traceback response obligations.
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8. Enforcement and Review

This Robocall Mitigation Plan is reviewed periodically and updated as necessary to comply with:

- FCC regulations;
- Industry best practices;
- Carrier requirements; and
- Operational changes.

Rykden Technology Solutions reserves the right to modify this plan at any time to maintain compliance with applicable law.

9. Certification Statement

M J Harper Holdings LLC d/b/a Rykden Technology Solutions certifies that:

1. It has implemented a robocall mitigation program reasonably designed to prevent the origination and transmission of illegal robocalls;
2. It will respond fully and promptly to traceback requests from the FCC, law enforcement, and the Industry Traceback Group;
3. It will cooperate in investigations involving illegal robocall activity; and
4. The information contained in its FCC Robocall Mitigation Database filing is true and accurate to the best of its knowledge.