

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Molokai Tech Services LLC (manaMOBILE)

FRN: 0037653995

Date: June 10, 2026

1. PROVIDER TYPE AND ROLE

Molokai Tech Services LLC ("manaMOBILE") is a non-originating voice service provider operating as a branded reseller of mobile telecommunications services. manaMOBILE does not operate its own network facilities and does not originate, terminate, or transport calls on its own network infrastructure. All voice calls placed by manaMOBILE subscribers originate on the networks of underlying facilities-based carriers, including AT&T, T-Mobile, and Verizon, through mobile virtual network enabler (MVNE) platforms.

2. STIR/SHAKEN STATUS

As a non-originating resale carrier, manaMOBILE does not deploy STIR/SHAKEN on its own facilities. The company's underlying facilities-based carriers and MVNE partners have fully implemented the STIR/SHAKEN caller ID authentication framework on their networks. All calls placed by manaMOBILE subscribers receive proper STIR/SHAKEN attestation at the point of origination by the underlying carrier.

3. ROBOCALL MITIGATION PROGRAM

manaMOBILE has implemented a robocall mitigation program consistent with 47 CFR § 64.6305(a) that includes the following measures:

a) Know Your Customer (KYC) Procedures — All subscribers undergo identity verification at activation. manaMOBILE collects and retains subscriber identification information including name, address, and contact details to deter and enable investigation of illegal robocalling activity.

b) Usage Monitoring — manaMOBILE will monitor subscriber usage patterns through MVNE-provided analytics to detect anomalous calling behavior indicative of robocalling, including abnormally high call volumes, short-duration calls, and calls to sequential numbers.

c) Terms of Service Enforcement — manaMOBILE's terms of service explicitly prohibit the use of its services for illegal robocalling, spoofing, or any fraudulent activity. Violations result in immediate suspension and termination of service.

d) Traceback Cooperation — manaMOBILE commits to respond fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement agencies, and the industry traceback consortium. manaMOBILE will cooperate with such entities in investigating and stopping any illegal robocallers that may use its service.

e) Point of Contact — manaMOBILE designates the following contact for traceback and robocall mitigation inquiries:

Jack J Morgan, Sole Member

Phone: 808-259-0396

Email: support@hi808.net

Address: 69E Puupeeelua Ave #376, Hoolehua, HI 96729

4. COMMITMENT

manaMOBILE certifies that it is committed to combating illegal robocalls and will take all reasonable steps to prevent its network from being used to originate, carry, or facilitate illegal robocall traffic. manaMOBILE will update this robocall mitigation program description within 10 business days of any material changes to its network operations or robocall mitigation practices.

5. PRINCIPALS AND AFFILIATES

Jack J Morgan — Sole Member and 100% owner (U.S. citizen). Molokai Tech Services LLC has no parent companies, subsidiaries, or affiliates.

Under penalty of perjury, I certify that the foregoing is true and correct.

Jack J Morgan

Sole Member, Molokai Tech Services LLC

June 10, 2026