

Robocall Mitigation Program Description

Ziyra LLC

Effective Date: June 11, 2026

1. Company Overview

Ziyra LLC is a provider of VoIP/Internet-based voice communication services. Ziyra LLC is committed to complying with all applicable federal regulations regarding robocall mitigation, including the requirements set forth by the Federal Communications Commission (FCC) under the TRACED Act and related rules.

2. STIR/SHAKEN Implementation

Ziyra LLC is in the process of implementing or has implemented the STIR/SHAKEN caller ID authentication framework to the extent technically feasible on its VoIP network. Where full STIR/SHAKEN implementation is not yet complete, Ziyra LLC has adopted the robocall mitigation measures described herein as an interim compliance measure.

3. Traffic Monitoring and Screening

Ziyra LLC actively monitors its network traffic for patterns associated with illegal robocalls, including but not limited to: abnormally high call volumes from a single source, spoofed caller ID numbers, calls to numbers on the Do-Not-Call Registry at unusually high rates, and other indicators of automated dialing activity. Suspicious traffic is reviewed promptly by company personnel.

4. Customer Onboarding and Acceptable Use

Ziyra LLC requires all customers and end users to agree to an Acceptable Use Policy (AUP) that expressly prohibits the transmission of illegal robocalls, spoofed calls, or any calls that violate the Telephone Consumer Protection Act (TCPA) or other applicable laws. Customers are screened prior to activation, and Ziyra LLC reserves the right to terminate service for any customer found to be in violation of these policies.

5. Response to Illegal Robocall Activity

Upon identifying or receiving credible notice of illegal robocall activity originating from its network, Ziyra LLC will take prompt action, which may include: investigating the source of the

traffic, suspending or terminating the responsible customer's service, blocking specific numbers or traffic patterns, and reporting findings to the appropriate authorities as required.

6. Traceback Cooperation

Ziyra LLC cooperates fully with traceback requests submitted by the FCC, USTelecom's Industry Traceback Group (ITG), law enforcement, and other authorized entities. Ziyra LLC responds to traceback requests in a timely manner and maintains records sufficient to support such investigations.

7. Record Keeping

Ziyra LLC maintains records of its robocall mitigation activities, customer agreements, and responses to traceback requests. These records are retained in accordance with applicable FCC regulations and are available for inspection upon lawful request.

8. Program Review and Updates

Ziyra LLC reviews and updates this Robocall Mitigation Program on a regular basis, and no less than annually, to ensure continued compliance with evolving FCC rules and industry best practices. Updates to this program will be reflected in amended filings to the FCC Robocall Mitigation Database as required.

9. Point of Contact

For questions, complaints, or traceback requests related to robocall mitigation, please contact Ziyra LLC at the general company contact information on file with the FCC Robocall Mitigation Database. Ziyra LLC is committed to responding to all legitimate inquiries promptly.

Certification

I hereby certify that the information provided in this Robocall Mitigation Program Description is accurate and complete to the best of my knowledge, and that Ziyra LLC is in compliance with the FCC's robocall mitigation requirements.

Authorized Signature: _____

Printed Name: _____

Title: _____

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