

Robocall Mitigation Program Description

NHEO HOLDINGS LLC

FCC FRN: 0038534814 | Wyoming LLC | EIN 42-2106559

The following describes the **specific reasonable steps** NHEO HOLDINGS LLC ("NHEO") has taken to avoid originating illegal robocall traffic, in accordance with 47 CFR § 64.6305(d)(2). All calls originated by NHEO are subject to this robocall mitigation program, consistent with 47 CFR § 64.6305(a).

1. Overview and Business Identification

NHEO HOLDINGS LLC (current and only business name; no previously used business names) is a Wyoming limited liability company (EIN 42-2106559; FCC FRN 0038534814) operating as a domestic (non-foreign) Voice Service Provider. NHEO originates outbound telephone calls exclusively to U.S. consumers who have provided documented prior express written consent through paid advertising campaigns conducted by NHEO and its licensed insurance agent-partners. NHEO's product line is limited to outbound callbacks for Final Expense Insurance, Mortgage Protection Insurance, and Life Insurance verticals. NHEO does NOT originate autodialed messages or pre-recorded message campaigns. All calls are agent-initiated progressive-dial with one licensed human agent attached to each call leg.

2. Role in the Call Path (47 CFR § 64.6300; Sixth Caller ID R&O para. 44)

NHEO HOLDINGS LLC is a **non-wholesale voice service provider that originates calls to end users** (residential consumers) and is therefore subject to 47 CFR § 64.6305(a) and (d). NHEO is not a gateway provider, not a non-gateway intermediate provider, not a wholesale voice service provider, and not a foreign voice service provider. NHEO does not carry, transit, or process traffic originated by any third party.

3. STIR/SHAKEN Implementation Status (47 CFR § 64.6305(d)(1))

NHEO HOLDINGS LLC has **not implemented** the STIR/SHAKEN caller-ID authentication framework directly on the Internet Protocol portions of its network. NHEO does not operate a SIP signing infrastructure, does not hold an STI certificate from an authorized Certification Authority, and does not operate as a Service Provider Code (SPC) token holder.

Extension / Exemption Claim (47 CFR § 64.6304 and Sixth Caller ID Authentication Report and Order, 38 FCC Rcd 2573 (2023), para. 45). NHEO is a small, non-facilities-based voice service provider that lacks the facilities necessary to implement STIR/SHAKEN. NHEO qualifies for the extension provided under 47 CFR § 64.6304 for providers that lack control of the network infrastructure necessary to implement the framework. This exemption applies to NHEO because: (a) NHEO does not own, lease, or control any SIP signaling infrastructure on which to deploy STI Authentication Service or Verification Service; (b) NHEO originates all calls through authenticated upstream voice service providers that perform STIR/SHAKEN signing on NHEO's behalf; and (c) NHEO is not a facilities-based provider and therefore cannot, as a practical matter, sign calls within its own network.

Notwithstanding the extension, all outbound calls originated by NHEO receive A-level attestation through its upstream voice service providers: **Telnyx LLC** (currently deployed and signing live traffic) and **BulkVS Inc.** (KYC pending; will sign at A level once approved), each using NHEO's FCC FRN 0038534814 as the originating identity. NHEO does not originate or transit unauthenticated voice traffic.

4. Prior Express Written Consent (Specific Reasonable Step)

Every called number in NHEO's outbound queue is associated with documented prior express written consent ("PEWC") obtained through a web form on paid landing pages owned and operated by NHEO or its licensed agent-partners. The consent record includes the consumer's full name, telephone number, IP address at time of consent, timestamp, and the URL of the landing page on which consent was given. Consent records are retained for a minimum of five (5) years and are made available to NHEO's upstream carriers, the FCC, the FTC, the Industry Traceback Group / industry traceback consortium, and law enforcement upon request.

5. Do Not Call Compliance (Specific Reasonable Step)

NHEO maintains multiple layers of Do Not Call compliance enforced pre-dial:

(a) Federal National DNC Registry: NHEO subscribes to the National Do Not Call Registry using FRN 0038534814. Numbers on the federal registry are permanently suppressed from NHEO's outbound queue.

(b) State DNC Lists: NHEO scrubs all outbound destinations against state Do Not Call registries via **TCPA Litigator List**, a commercial real-time API service that aggregates state DNC data, plaintiff/serial filer databases, and reassigned number information.

(c) Internal Company-Specific DNC: NHEO maintains an internal company-specific DNC registry populated automatically whenever an agent or recipient invokes any do-not-call verbal request. Internal DNC entries are permanent and synchronized across all agents in real time.

(d) Re-scrub Frequency: Every called number is re-scrubbed against federal, state, and internal DNC lists at minimum every 31 calendar days, and immediately before each outbound dial attempt.

6. Call Time Compliance

NHEO enforces the 8:00 AM to 9:00 PM called-party local time window pre-dial. Time zone for each called party is derived from the destination telephone number's NPA (area code) via an internal NPA-to-IANA timezone map covering all U.S. and Canadian area codes. The calling window check fails-closed: any call that cannot be unambiguously placed within the lawful window is automatically blocked and never originated. The system additionally enforces federal holiday quiet periods.

7. Call Frequency Limits

NHEO enforces conservative call frequency limits per called number: maximum one (1) call attempt every four (4) hours, and maximum three (3) attempts per calendar day. After any verbal do-not-call request from the called party, the number is added to NHEO's internal DNC registry with permanent suppression. Numbers reaching the no-answer threshold are placed into an extended cooldown.

8. Answering Machine Detection (AMD)

NHEO uses Answering Machine Detection to identify voicemail systems. When AMD identifies a non-human answer, the call is terminated without leaving any pre-recorded message. NHEO does NOT leave pre-recorded messages on answering machines, voicemail boxes, or interactive voice response systems under any circumstances.

9. Caller ID Integrity

NHEO does not spoof, alter, or manipulate caller ID. All outbound calls display a telephone number lawfully assigned to NHEO HOLDINGS LLC by its upstream carrier with a registered CNAM (Caller ID Name) listing. NHEO does not use caller IDs assigned to other entities or untraceable numbers.

10. Affirmative, Effective Measures for New and Renewing Customers (47 CFR § 64.6305(d)(2)(ii))

NHEO takes **affirmative, effective measures to prevent new and renewing customers from originating illegal calls**. NHEO's "customers" for purposes of 47 CFR § 64.6305(d)(2)(ii) are the licensed insurance agent-partners and any commercial sub-accounts authorized to place outbound calls through NHEO's platform.

(a) Identity Verification and KYC at Onboarding. Before any new customer is granted outbound calling privileges, NHEO collects and verifies: (i) the customer's legal name and state of formation; (ii) state insurance producer license number(s) and a current certificate of authority for every state the customer intends to dial into; (iii) government-issued photo identification of the principal; (iv) U.S. business address; and (v) signed Master Services Agreement and Acceptable Use Policy.

(b) Contractual Prohibition on Illegal Calls. Every NHEO customer agreement expressly prohibits: originating unlawful robocalls; spoofing or manipulating caller ID in violation of the Truth in Caller ID Act; calling numbers on the federal or any state DNC list without an applicable exemption; calling consumers without documented PEWC; and any violation of the TCPA or FCC rules.

(c) PEWC-Only Call-List Audit. NHEO programmatically validates that every destination number uploaded by a customer is matched to a PEWC record in NHEO's consent ledger. Numbers without a matching PEWC record are rejected from the dialer queue.

(d) Monitoring of New Customers. New customers are placed in a 60-day enhanced monitoring window during which NHEO reviews complaint rates, traceback frequency, agent-script compliance, and answer/abandon patterns. Customers exhibiting elevated complaint or traceback rates are suspended pending investigation.

(e) Renewal-Time Re-Vetting. At each annual renewal of customer status, NHEO re-verifies state insurance licensing, re-confirms acceptance of the Acceptable Use Policy, and reviews the customer's prior-year complaint and traceback history. Renewal is denied if material non-compliance is found.

(f) Suspension and Termination Triggers. NHEO will immediately suspend any customer found to be originating illegal robocalls, spoofing caller ID, calling numbers without PEWC, or refusing to cooperate with a traceback. Termination follows confirmed violations, with reporting to the upstream carriers, the FCC, and the industry traceback consortium where appropriate.

11. Call Analytics and Illegal-Traffic Identification (47 CFR § 64.6305(d)(2)(ii))

NHEO discloses the following with respect to call analytics systems used to identify and block illegal traffic.

(a) NHEO-Operated Pre-Dial Analytics. NHEO operates the following in-house pre-dial controls that function as analytics to prevent the origination of illegal traffic: (i) PEWC ledger match (described above); (ii) federal DNC, state DNC, and internal DNC scrubs via TCPA Litigator List (DNC/reassigned-number/litigator data); (iii) lawful-window time-zone gate; (iv) frequency cap enforcement; and (v) complaint and abandonment monitoring per customer.

(b) Third-Party Vendor Disclosure. The third-party data vendor used by NHEO is **TCPA Litigator List** (DNC, reassigned-number, and litigator/serial-filer data). NHEO does not currently contract directly with a STIR/SHAKEN-grade call-analytics vendor (e.g., TransNexus, Hiya, Numeracle, iconectiv, YouMail) because NHEO does not operate the SIP signaling infrastructure such vendors integrate with.

(c) Upstream Analytics Reliance. NHEO relies on the call analytics and illegal-traffic-identification systems operated by its upstream voice service providers **Telnyx LLC** (Telnyx Voice Integrity / fraud and abuse detection) and **BulkVS Inc.** (BulkVS abuse-monitoring and traceback intake) to identify and block any traffic on NHEO's account that exhibits illegal-robocall characteristics. NHEO cooperates with each upstream's analytics-driven enforcement, including immediate suspension of identified customers and provision of CDRs and consent records on request.

(d) Operating Model Mitigation. Because every NHEO call is a 1:1 agent-initiated progressive dial to a PEWC lead with no autodialer and no pre-recorded message, NHEO's call pattern is structurally inconsistent with

illegal robocall traffic. This is an additional compensating control, not a substitute for the analytics described above.

12. Agent and Customer Training and Conduct

All licensed insurance agent-partners using NHEO's platform are required by contract to: (a) identify themselves by name and identify NHEO HOLDINGS LLC and the licensing carrier at the start of every call; (b) honor verbal do-not-call requests immediately and add the number to permanent suppression; (c) comply with all federal and state-specific calling rules including recording disclosure requirements; (d) maintain current state insurance licensing for any state they dial into. NHEO conducts annual compliance training and ad-hoc training following any material regulatory development.

13. Traceback Commitment (47 CFR § 64.6305(a)(2))

NHEO HOLDINGS LLC commits to respond within twenty-four (24) hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (operated by USTelecom as the Industry Traceback Group (ITG)), and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. This commitment is firm; the 24-hour figure is a maximum, not a target. NHEO maintains complete call detail records (CDR), call recordings, and consent records for a minimum of five (5) years, all of which are immediately available for traceback purposes. NHEO will additionally cooperate with state attorneys general and any other lawful authority making robocall-related inquiries.

14. Call Recording and Audit Trail

All outbound calls placed through NHEO's platform are recorded with all required state-law disclosures. Recordings, CDRs, consent records, and all related metadata are retained for a minimum of five (5) years in encrypted cloud storage with access logging and are available to support traceback investigations.

15. Ownership, Principals, Affiliates, and Subsidiaries (Sixth Caller ID R&O para. 46)

Principal / Managing Member and Ultimate Beneficial Owner: Nicolas Henao Ochoa (100% Managing Member of NHEO HOLDINGS LLC). **Parent companies:** none. **Subsidiaries:** none. **Affiliates:** none. NHEO HOLDINGS LLC has no parent company, no subsidiaries, and no affiliated voice service providers, gateway providers, or non-gateway intermediate providers.

16. Enforcement Action History (Sixth Caller ID R&O paras. 46-47)

NHEO HOLDINGS LLC has **not** been the subject of any formal Commission, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing concerning illegal robocalling. NHEO is not aware of any pending or threatened such action or investigation as of the date of this submission.

17. Negative Certifications Regarding RMD Status

- (a) No prior submission by NHEO HOLDINGS LLC to the Robocall Mitigation Database has been removed by Commission action.
- (b) NHEO HOLDINGS LLC has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

18. Operating Company Number (OCN)

NHEO HOLDINGS LLC does not currently hold an Operating Company Number (OCN). NHEO is not a Local Exchange Carrier and does not require an OCN for its current operations.

19. Update Obligation (47 CFR § 64.6305(d)(5))

NHEO HOLDINGS LLC will file an updated submission in the Robocall Mitigation Database **within ten (10) business days** of any change to the information required by 47 CFR § 64.6305(d), including but not limited to changes in STIR/SHAKEN implementation status, designated point of contact, business name or address (via CORES FRN update), ownership or principals, enforcement history, upstream voice service provider relationships, or the substance of this robocall mitigation program.

20. Designated Robocall-Mitigation Point of Contact (Sixth Caller ID R&O para. 42)

Name: Nicolas Henao Ochoa

Title: Managing Member and Chief Compliance Officer

Department: Regulatory Compliance — Office of the Managing Member

Company: NHEO HOLDINGS LLC

Business Address: 312 W 2nd St Unit #A2299, Casper, WY 82601

Telephone: +1 (786) 424-6004

Email: nhao@nheo.ai

This designated point of contact is the single person within NHEO responsible for addressing robocall mitigation-related issues, and is the same individual who, as an officer of NHEO HOLDINGS LLC, signs the certification below under penalty of perjury.

21. Officer Certification Under Penalty of Perjury (47 CFR § 1.16; 47 CFR § 64.6305(d)(3))

I, Nicolas Henao Ochoa, an officer (Managing Member) of NHEO HOLDINGS LLC, hereby certify the following:

"I declare under penalty of perjury under the laws of the United States of America that the foregoing Robocall Mitigation Program Description is true and correct, that I am authorized to make this certification on behalf of NHEO HOLDINGS LLC, and that NHEO HOLDINGS LLC's submission to the Robocall Mitigation Database, including this program description, complies with the requirements of 47 CFR § 64.6305."

Signature: _____

Printed Name: Nicolas Henao Ochoa

Title: Managing Member, NHEO HOLDINGS LLC

Date: _____

This Robocall Mitigation Program Description is filed pursuant to 47 CFR § 64.6305 and the FCC's Robocall Mitigation Database requirements (Second and Sixth Caller ID Authentication Report and Order). The electronic signature captured by the RMD portal under 47 CFR § 1.16 is incorporated by reference into the above certification.