

ROBOCALL MITIGATION PROGRAM CERTIFICATION

Lenroe Hawthorne (Sole Proprietor)
FCC Registration Number (FRN): 0038543104

1. Filer Information

Lenroe Hawthorne ("Hawthorne") is a domestic United States voice service provider operating as a sole proprietorship, located at 12722 Hunters Chase St, San Antonio, Texas 78230, United States. Hawthorne's FCC Registration Number (FRN) is 0038543104. Hawthorne does not hold an Operating Company Number (OCN). Hawthorne provides AI-assisted voice communications services to business end-user customers, originating outbound calls and receiving inbound calls. Hawthorne obtains call origination and termination and telephone numbering resources through underlying wholesale carrier partners and does not operate its own public switched telephone network facilities. All of Hawthorne's traffic is domestic; Hawthorne does not accept calls directly from foreign providers and performs no gateway function. For purposes of this filing, Hawthorne is a Voice Service Provider that originates calls and serves end users.

2. STIR/SHAKEN Status

Hawthorne is a newly operational provider. The underlying wholesale carriers through which Hawthorne originates traffic participate in the STIR/SHAKEN caller identification authentication framework and authenticate (sign) calls in the IP portions of the network. Hawthorne has not yet obtained its own Service Provider Code (SPC) token, which requires an OCN. Hawthorne is pursuing the necessary prerequisites, including a Form 499-A filer identification and an OCN, and will implement STIR/SHAKEN authentication for the calls it originates as soon as it is eligible to do so. Pending and alongside that implementation, Hawthorne maintains the robocall mitigation program described below, which applies to all calls Hawthorne originates.

3. Reasonable Steps to Avoid Originating Illegal Robocall Traffic

- **3.1 Know-Your-Customer (KYC) Due Diligence: Before enabling any customer to originate calls, Hawthorne verifies the customer's identity and legitimacy.** This includes confirming the legal business name and registration, collecting a valid business identifier (e.g., EIN) and physical address, identifying an authorized contact, and documenting the customer's intended use case, calling campaigns, and expected call volumes. Hawthorne screens prospective customers against publicly available information regarding known robocall and fraud actors and declines or escalates high-risk applicants.
- **3.2 Acceptable Use Policy and Contractual Commitments:** Every customer must agree to Hawthorne's Acceptable Use Policy (AUP) and service terms. These terms explicitly prohibit the origination of unlawful robocalls and any calls that violate the Telephone Consumer Protection Act (TCPA), the Telemarketing Sales Rule, or FCC rules. Customers are required to obtain and retain legally required prior express consent, are prohibited from caller ID spoofing, and must honor do-not-call requests and consumer opt-outs.
- **3.3 Caller ID and Consent Integrity:** Hawthorne requires customers to transmit accurate and valid caller identification on every call and to use numbers legitimately assigned to them. Hawthorne's platform supports

consumer opt-out handling and requires customers to maintain records demonstrating consent, which must be produced upon request.

- **3.4 Monitoring and Analytics:** Hawthorne monitors traffic for indicators of illegal robocalling, including abnormal call volumes, high short-duration-call ratios, low answer/completion rates, and sudden traffic spikes. Hawthorne reviews notices and analytics from underlying carriers and acts on any traceback or abuse notifications received.

4. Response to Traceback Requests

Hawthorne is committed to responding fully and within 24 hours to all traceback requests it receives from the Commission, law enforcement, and the USTelecom Industry Traceback Group (ITG). Hawthorne maintains call detail records sufficient to identify the upstream source or the originating customer of any call that is the subject of a traceback and will provide that information promptly.

5. Mitigation of Identified Illegal Traffic

When Hawthorne learns—through traceback, notification from the Commission or law enforcement, or internal monitoring—that a customer may be originating illegal robocall traffic, Hawthorne will promptly investigate. Where warranted, Hawthorne will take effective mitigating action, including warnings, rate-limiting, blocking specific traffic, or terminating the offending customer. Hawthorne will not knowingly originate illegal robocall traffic.

6. Preventing New and Renewing Customers from Originating Illegal Calls

Hawthorne applies KYC and AUP requirements to all new customers at onboarding and re-evaluates customers upon renewal or whenever risk indicators arise. Hawthorne reserves the contractual right to audit compliance and terminate customers who violate policies or applicable law.

7. Cooperation with Enforcement

Hawthorne will cooperate fully with the Commission, law enforcement agencies, and the ITG in the investigation and pursuit of entities that originate illegal robocalls, including providing information to help trace and identify the source of suspect traffic.

8. Robocall Mitigation Point of Contact

- **Name:** Lenroe Hawthorne
- **Title:** Owner
- **Telephone:** 351-322-9498
- **Email:** jimkarasadmin@appsecuresupport.net

9. Review and Updates

Hawthorne will review and update this robocall mitigation program as operations evolve, including upon completing STIR/SHAKEN implementation, and will revise its Robocall Mitigation Database (RMDb) filing as required, recertifying annually by March 1.

Certification

Submitted on behalf of Lenroe Hawthorne by Lenroe Hawthorne, Owner. This robocall mitigation program is maintained pursuant to 47 CFR § 64.6305 and 47 CFR § 64.1200(n).