

# Robocall Mitigation Program Description

## SBHelpGroup LLC

|                               |                                  |
|-------------------------------|----------------------------------|
| Legal Entity Name             | SBHelpGroup LLC                  |
| FCC Registration Number (FRN) | 0038550604                       |
| FCC Form 499 Filer ID         | 839028                           |
| Business Address              | 25 Wick Ave, Hermitage, PA 16148 |
| Robocall Mitigation Contact   | Daniel Hanna, Member             |
| Contact Email                 | dhanna@sbhelpgroup.com           |
| Contact Telephone             | 330-207-2148                     |
| Date                          | June 17, 2026                    |

### 1. Provider Overview

SBHelpGroup LLC is a Pennsylvania limited liability company that operates Straton, a business software platform built for sales teams and small businesses. Straton includes customer relationship management, lead management, workflow automation, booking, messaging, and outbound voice tools. SBHelpGroup LLC is a domestic U.S. company and is not filing as a foreign voice service provider, gateway provider, or facilities-based international gateway carrier.

For this Robocall Mitigation Database filing, SBHelpGroup LLC is filing as a Voice Service Provider. SBHelpGroup LLC expects to originate outbound voice traffic for business customers through approved upstream voice service providers. Calls placed through Straton will be routed through approved upstream provider networks, including BulkVS where applicable, for voice network origination, numbering, call routing, and call authentication functions.

### 2. Role in the Call Chain and STIR/SHAKEN

SBHelpGroup LLC is selecting the voice service provider role of a provider with a STIR/SHAKEN implementation obligation acting as a wholesale provider originating calls. SBHelpGroup LLC is also selecting the Complete STIR/SHAKEN Implementation certification based on the fact that outbound calls originated through Straton will be routed only through approved upstream provider network paths that support STIR/SHAKEN authentication for originated calls.

SBHelpGroup LLC does not intend to create a separate unauthenticated call path for customer traffic. The company will use approved upstream voice providers for the network functions needed to originate and authenticate calls. SBHelpGroup LLC will keep records of upstream providers, assigned numbers, customer accounts, campaign configuration, call logs, dispositions, and traffic controls so that suspicious traffic can be reviewed, stopped, and traced when necessary.

SBHelpGroup LLC will not knowingly route traffic through a provider path designed to avoid caller ID authentication, traceback cooperation, or other robocall mitigation obligations.

### 3. Customer Onboarding and Account Controls

SBHelpGroup LLC is building Straton for legitimate business use, not anonymous bulk calling. Before outbound voice access is enabled, SBHelpGroup LLC may review the customer's business identity, business purpose, intended calling use case, expected call volume, and the general source of leads or contacts to be called.

Customers are required to use the service lawfully and may not use Straton or any SBHelpGroup LLC-provided calling functionality for illegal robocalls, spoofing, fraud, scam traffic, deceptive caller ID practices, or attempts to avoid carrier analytics, traceback, enforcement, or compliance controls.

### 4. Lead Source, Consent, and Suppression Practices

SBHelpGroup LLC requires customers using outbound calling tools to use lawful data and maintain an appropriate basis to call. Depending on the campaign, that may include verified opt-in leads, customer-supplied consent records, existing customer relationship data, or customer-managed DNC and suppression procedures.

Straton will include internal suppression controls such as client-level do-not-call suppression, manual suppression, disposition-based suppression, disconnected or bad-number suppression, and campaign-level calling restrictions. Customers must honor opt-out and do-not-call requests. SBHelpGroup LLC may suspend or terminate customer access if a customer fails to follow suppression requirements or if traffic patterns indicate unlawful or abusive calling.

## **5. Caller ID, DID, and Campaign Controls**

Customers may use only telephone numbers that are assigned to them, authorized for their campaign, or otherwise permitted by SBHelpGroup LLC and its upstream provider. SBHelpGroup LLC will not permit customers to intentionally transmit false or misleading caller ID information, impersonate another business, or use caller ID practices designed to deceive called parties or evade enforcement.

SBHelpGroup LLC may limit, rotate, pause, or remove numbers from campaigns where call analytics, complaints, traceback activity, carrier feedback, or internal review indicate elevated risk.

## **6. Traffic Monitoring and Risk Review**

SBHelpGroup LLC will monitor outbound traffic using practical indicators of suspicious or abusive calling. These indicators may include sudden volume changes, abnormal answer rates, short-duration calls, high failure rates, repeated dialing patterns, disconnected-number results, complaint indicators, carrier warnings, traceback notices, geographic anomalies, and unusual DID performance.

When traffic appears suspicious, SBHelpGroup LLC may pause, throttle, restrict, or terminate traffic at the customer, campaign, user, number, or provider-route level. SBHelpGroup LLC may also require the customer to provide lead source information, consent records, campaign explanation, corrective action, or other documentation before traffic is restored.

## **7. Traceback Response and Cooperation**

SBHelpGroup LLC commits to respond fully and within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, and the Industry Traceback Group or other authorized traceback consortium. SBHelpGroup LLC will cooperate with those entities and with its upstream voice providers to investigate and stop illegal robocallers that use, attempt to use, or misuse SBHelpGroup LLC services.

When SBHelpGroup LLC receives a traceback request or credible notice of illegal traffic, it will use available records to identify the customer account, campaign, calling number, user, call timestamps, call records, relevant disposition information, and upstream provider path. SBHelpGroup LLC will take reasonable action to stop suspected illegal traffic, including suspending campaigns, disabling numbers, restricting accounts, preserving relevant records, and cooperating with the requesting authority and upstream provider.

## **8. Recordkeeping**

SBHelpGroup LLC will maintain records that support robocall mitigation and traceback response. These records may include customer account information, customer contact information, assigned DIDs, user records, campaign records, call logs, timestamps, dispositions, suppression records, compliance notes, provider notices, traceback correspondence, and enforcement or remediation actions taken by SBHelpGroup LLC.

The company will retain those records for a reasonable period consistent with applicable law, provider requirements, and operational needs.

## **9. Enforcement and Remediation**

SBHelpGroup LLC reserves the right to investigate, pause, restrict, suspend, or terminate any customer, user, campaign, DID, or traffic pattern that violates applicable law, platform policy, provider requirements, or robocall mitigation standards. SBHelpGroup LLC may require proof of lawful calling authority, lead source documentation, consent documentation, DNC/suppression procedures, or corrective action before restoring service.

If a customer cannot provide a reasonable explanation or corrective plan, SBHelpGroup LLC may terminate the customer's access to outbound voice functionality.

## **10. Prior Robocall-Related Enforcement Actions**

To the best of SBHelpGroup LLC's knowledge, SBHelpGroup LLC has not, within the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or due to a deficient Robocall Mitigation Database certification or mitigation program description.

## **11. Ongoing Review and Updates**

SBHelpGroup LLC will review this mitigation program as its services, upstream providers, customer base, calling functionality, or legal obligations change. SBHelpGroup LLC will update its Robocall Mitigation Database filing when required and will maintain a current robocall mitigation point of contact.

## **Officer Certification**

I certify that the foregoing Robocall Mitigation Program Description is true and correct to the best of my knowledge, information, and belief, and that SBHelpGroup LLC will maintain and enforce the mitigation practices described in this document.

Daniel Hanna

Member, SBHelpGroup LLC

Date: June 17, 2026