

Robocall Mitigation Program

Company Name: Tritan Internet LLC
FCC Registration Number (FRN): 0038553160
Effective Date: June 21, 2026
Primary Contact: abuse@tritan.gg / legal@tritan.gg
Address: 30 N Gould St Ste R, Sheridan, WY 82801, USA

1. Executive Summary & Purpose

This Robocall Mitigation Program (RMP) establishes the policies and procedures implemented by Tritan Internet LLC to identify, prevent, and mitigate the origination and transmission of illegal robocalls. As a provider planning future PBX resale services, Tritan recognizes its role in the ecosystem to ensure voice integrity and compliance with the TRACED Act and FCC regulatory requirements.

2. STIR/SHAKEN Implementation Strategy

Tritan Internet LLC currently operates as a non-originating provider and intends to enter the market as a reseller of hosted PBX services. Our strategy regarding STIR/SHAKEN includes:

- **Upstream Reliance:** Tritan will partner exclusively with upstream voice service providers that maintain full STIR/SHAKEN compliance.
- **Pass-Through Compliance:** All call traffic originating from our future PBX platform will be authenticated via our upstream carrier's STIR/SHAKEN framework.
- **Attestation Verification:** We will ensure that all calls traversing our network carry valid caller ID attestation levels, and we will reject or flag traffic that fails authentication checks upon ingress to our network.

3. Customer Vetting and KYC (Know Your Customer)

To prevent bad actors from utilizing our PBX resale services, Tritan implements a mandatory customer vetting process prior to service activation:

- **Entity Verification:** Prospective customers must provide valid business registration documents, EIN (Employer Identification Number), and authorized signatory information.

- **Nature of Traffic Assessment:** Customers must submit a forecast of intended call volume, geographic targeting, and service use-case (e.g., enterprise, customer support, marketing).
- **Risk Profiling:** Each prospective customer is screened against internal risk databases, third-party blacklists (such as the FCC's Robocall Mitigation Database, and other industry threat feeds), and high-risk origin lists.

4. Fraud Detection and Analytics

Upon service launch, Tritan will utilize automated monitoring tools to identify suspicious traffic patterns. Key performance indicators (KPIs) include:

- **ASR (Answer Seizure Ratio) & NER (Network Efficiency Ratio):** Abnormal drops in ASR/NER, indicative of potential robotic dialers, will trigger automated alerts.
- **PDD (Post-Dial Delay):** Monitoring for low PDDs, which are often characteristic of automated dialers.
- **Volume Thresholds:** Real-time monitoring of concurrent call sessions (CPS) and daily minute volume. Accounts exceeding baseline thresholds without pre-authorization will be automatically suspended pending manual review.

5. Abuse Handling and Remediation

Tritan maintains a robust abuse response framework to handle complaints from the public, law enforcement, and industry partners:

- **Abuse Channel:** Reports should be directed to abuse@tritan.gg.
- **Verification & Investigation:** Upon receipt of a valid complaint, the abuse team will verify the origin of the traffic within 24 hours.
- **Mitigation Actions:** Verified illegal traffic will result in immediate suspension of the offending account, blocking of the spoofed number, and/or termination of the customer's contract.
- **Traceback Cooperation:** Tritan commits to responding to all traceback inquiries from the Industry Traceback Group (ITG) and law enforcement within the required timeframes.

6. Annual Compliance & Audit

Tritan will conduct an annual comprehensive audit of its Robocall Mitigation Program. This audit includes:

- Updating internal procedures to align with evolving FCC regulations.
- Reviewing vendor agreements to ensure continued STIR/SHAKEN adherence.

- Refreshing the vetting process to include updated industry-standard threat intelligence.

7. Certification of Responsibility

I certify that I am an authorized representative of Tritan Internet LLC. The information contained herein represents our good-faith commitment to robocall mitigation. We agree to cooperate fully with the FCC and relevant law enforcement entities to combat illegal robocalls.

Dylan M. Burke

Name: Dylan M. Burke

Title: President & CEO

Date: 06/21/2026