

FCC Robocall Mitigation Database (RMD) Program Description for Full Spectrum Communications, Inc.

Full Spectrum Communications, Inc. operates a closed, privately managed voice network for its own business operations and those of a commonly owned affiliated company. Because the affiliate is under identical corporate ownership and oversight, the company maintains direct visibility and strict control over all network users, fully satisfying "Know Your Customer" (KYC) vetting requirements through internal corporate governance. The company does not provide wholesale voice origination, retail long-distance service, SIP trunking, hosted PBX services, or outbound calling capabilities to the public or to unrelated third parties.

All outbound calls originate exclusively from Full Spectrum Communications, Inc.-owned and managed switching equipment and applications. The company does not provide any external means by which third parties can originate outbound calls over its network. There are no customer-accessible interfaces, APIs, SIP registrations, or other facilities that permit unrelated users to inject outbound traffic into the company's voice network. Outbound traffic is limited to Full Spectrum Communications, Inc.'s own operations and those of its commonly owned affiliate. The company does not originate traffic on behalf of unrelated entities and does not resell voice origination or termination services.

The company does not engage in outbound telemarketing, political calling, debt collection, lead generation, or other unsolicited outbound calling campaigns. The majority of outbound calls are generated in response to actions initiated by existing customers requesting connection to remote service providers or are operational calls necessary to support those services. All telephone numbers used for outbound calling are numbers that are owned by, assigned to, or otherwise authorized for use by Full Spectrum Communications, Inc. or its affiliated company, and are verified for authorization at the time of procurement. Caller ID information is presented accurately and is not intentionally spoofed or altered to misrepresent the identity of the calling party.

Full Spectrum Communications, Inc. is actively in the process of implementing the STIR/SHAKEN framework natively within its proprietary

platform infrastructure. The company has already successfully completed vetting with the Secure Telephone Identity Governance Authority (STI-GA) and is approved to obtain its own independent Secure Telephone Identity (STI) token / SPC token. Full deployment, testing, and live token-signing are actively underway and anticipated to be fully completed by September 1, 2026. Where supported during this development phase by upstream service providers, outbound calls are authenticated using the STIR/SHAKEN framework with the highest appropriate attestation level based upon the company's authorized use of the originating telephone numbers. Full Spectrum Communications, Inc. works with its originating carriers to maintain proper caller authentication and to resolve any issues affecting the reputation or authentication of its legitimate outbound traffic.

Because all call origination occurs on company-controlled equipment, Full Spectrum Communications, Inc. maintains end-to-end operational control over caller identification, call routing, network access, and fraud prevention. Outbound calling activity is continuously monitored for abnormal traffic patterns, including unusual calling volumes, excessive short-duration calls, elevated failure rates, unexpected calling destinations, and other indicators of potential abuse. During this transitional implementation phase, the company relies on enhanced proactive traffic monitoring and strict internal corporate governance of its commonly owned affiliate to prevent the origination of any unauthenticated or unauthorized outbound traffic. Access to the voice network is restricted to authorized personnel and approved applications. Internal controls are in place to prevent unauthorized use of the network or misuse of assigned telephone numbers. Any suspected abuse or anomalous activity is investigated promptly, and appropriate corrective action, including suspension or termination of services where applicable, is taken.

The company investigates complaints regarding unwanted or potentially illegal calling activity and cooperates with upstream carriers, downstream carriers, industry traceback organizations, and law enforcement agencies. Full Spectrum Communications, Inc. fully cooperates with all authorized traceback requests, responding within the required 24-hour window, and maintains records necessary to support investigations of suspected illegal robocalling. Full Spectrum Communications, Inc. periodically reviews its network operations, caller authentication procedures, traffic monitoring practices, and robocall mitigation controls to ensure continued compliance

with FCC regulations and evolving industry best practices. The company is committed to preventing the origination of illegal robocalls while ensuring the reliable delivery of legitimate customer communications.