

## Robocall Mitigation Plan – FCC Robocall Mitigation Database Filing

|                                             |                                                      |
|---------------------------------------------|------------------------------------------------------|
| <b>Effective Date</b>                       | July 19, 2026                                        |
| <b>Annual Recertification Due</b>           | March 1, 2027                                        |
| <b>Plan Review Cycle</b>                    | Annually, or sooner if warranted by FCC rule changes |
| <b>Legal Business Name</b>                  | LaCelle 3 Media LLC                                  |
| <b>Principal Business Office Location</b>   | 645 NE Campus St, APT E, Pullman, WA 99163           |
| <b>FCC Registration Number (FRN)</b>        | 0038615837                                           |
| <b>Certifying Officer</b>                   | Hayden LaCelle, LLC Executor / Owner                 |
| <b>Certifying Officer Contact Email</b>     | hayden.lacelle@lacelle3.com                          |
| <b>Certifying Officer Contact Phone</b>     | +1 (509) 715-0572, option 2                          |
| <b>Contact Phone for Customer Inquiries</b> | +1 (509) 715-3517                                    |

### Section 1 – Company Identification and Description

LaCelle 3 Media LLC (hereinafter “the Company”) is a non-facilities-based interconnected Voice over Internet Protocol (VoIP) provider and telecommunications reseller organized as a limited liability company under the laws of the State of Washington. The Company was incorporated on September 11, 2025, and commenced telecommunications service operations in July 2026.

The Company operates as a reseller under the VoIP.ms Reseller Program, utilizing 9171-5573 QUEBEC INC. (doing business as VoIP.ms) as its upstream wholesale carrier. The Company does not own, operate, or control any physical telecommunications infrastructure, switching equipment, or network facilities. All underlying call origination, termination, PSAP routing, and carrier-level authentication functions are performed by VoIP.ms as the facilities-based upstream carrier.

The Company’s service offering consists of managed Dedicated Inward Dialing (DID) lines provisioned on behalf of end-user clients, consisting primarily of individual content creators, freelancers, and small businesses. The Company configures and manages call routing, Interactive Voice Response (IVR) systems, call ring groups, call screening, voicemail, and caller ID on behalf of each client through the VoIP.ms reseller portal.

The Company is classified as an interconnected VoIP provider under 47 CFR § 9.3, as its service allows end users to receive calls from and place calls to the Public Switched Telephone Network (PSTN). The Company is further classified as a Local Reseller and Toll Reseller under FCC Form 499-A reporting categories, consistent with its wholesale-to-retail business model.

The Company certifies that it has not been prohibited from filing in the Robocall Mitigation Database and has not been subject to any Commission, law enforcement, or regulatory agency action or investigation arising from suspected robocalling or spoofing.

## **Section 2 – STIR/SHAKEN Implementation Status**

### **2.1 Implementation Status: Option 3 – No Direct STIR/SHAKEN Implementation**

As a non-facilities-based VoIP reseller, the Company is not eligible to directly implement the STIR/SHAKEN call authentication framework as defined under 47 CFR §§ 64.6300–64.6340 and the Call Authentication Trust Anchor proceeding (WC Docket No. 17-97). The Company does not control the originating infrastructure through which calls are authenticated and therefore cannot independently obtain a Service Provider Code (SPC) token or execute STIR/SHAKEN attestation.

This exemption is consistent with FCC precedent established in FCC 20-42, paragraph 40, which states that STIR/SHAKEN rules “do not apply to providers that lack control of the network infrastructure necessary to implement STIR/SHAKEN.” As a reseller that does not operate its own switching or SIP infrastructure, the Company falls within this exemption.

### **2.2 Carrier-Level STIR/SHAKEN Coverage**

The Company’s upstream carrier, 9171-5573 QUEBEC INC. (doing business as VoIP.ms), implements STIR/SHAKEN at the carrier level for all traffic originating through the VoIP.ms network. VoIP.ms has confirmed in writing (correspondence dated June 29, 2026, reference VoIP.ms ticket #IAE9JZ) that the following attestation levels apply to the Company’s reseller sub-account traffic:

- **Attestation A (Full Attestation):** Applied to outbound calls originating from a VoIP.ms-provisioned DID number, confirming that VoIP.ms is responsible for the origination of the call, the calling party is authenticated, and the call originates from a number assigned to the customer.
- **Attestation C (Gateway Attestation):** Applied to outbound calls not using a VoIP.ms DID or an unverified Caller ID, confirming that VoIP.ms has authenticated the call’s entry point into the network but cannot verify the calling party’s identity or number assignment.

Under the Company's standard managed service model, all client DID numbers are VoIP.ms-provisioned or ported-into-VoIP.ms numbers. Therefore, all outbound calls made through LaCelle 3 Media LLC managed lines under normal operating conditions receive Attestation A.

### **2.3 Non-Implementation Acknowledgement**

Pursuant to 47 CFR § 64.6305(d)(3), the Company acknowledges that it has not implemented STIR/SHAKEN directly and submits this robocall mitigation plan in lieu of full implementation, as permitted for providers that cannot implement STIR/SHAKEN due to technical or operational constraints inherent to their provider classification. The Company relies on VoIP.ms’ carrier-level STIR/SHAKEN implementation and will update this filing if its STIR/SHAKEN status changes.

## **Section 3 – Know Your Customer (KYC) Procedures**

### **3.1 Pre-Service Verification Requirements**

The Company has implemented Know Your Customer procedures applicable to all prospective clients prior to the provisioning of any telecommunications service, consistent with the principles articulated in the Advanced Methods to Target and Eliminate Unlawful Robocalls proceeding (CG Docket No. 17-59) and the FCC's April 2026 Know Your Customer Further Notice of Proposed Rulemaking. Prior to activation of any DID line, the Company requires each prospective client to provide and confirm the following information:

- Full legal name of the individual or business entity
- Business name, if different from the individual's legal name
- Primary email address for the account
- Primary contact phone number
- Physical service address (primary place of use) for E911 registration purposes
- Intended use case for the managed line (e.g. business contact line, commission inquiries, press and media, general business use)

### 3.2 Service Agreement Execution

No DID line is activated prior to the execution of a signed service agreement between the Company and the client. The service agreement explicitly prohibits the use of LaCelle 3 Media LLC-managed lines for any purpose that violates applicable federal or state telecommunications laws, including but not limited to the Telephone Consumer Protection Act (TCPA), 47 U.S. Code § 227, and FCC regulations governing robocall and spoofed caller ID practices under 47 U.S. Code § 227(e) (Truth in Caller ID Act).

### 3.3 Account ID Assignment and Registry Maintenance

Upon onboarding, each client is assigned a unique LaCelle 3 Media LLC Account ID (also known as a LC3M ID, or a LC3M Client ID) in the format of 6 numerical digits (XXXXXX). The Company maintains an internal client registry documenting each client's account ID, legal name, business name, primary place of use address, provisioned DID number(s), E911 registration status, activation date, and service agreement execution date. This registry serves as the Company's primary record for client identity verification and traceback response purposes.

### 3.4 Identity Verification for Account Changes

Prior to processing any sensitive account change, including but not limited to DID cancellation, call routing modification, E911 address updates, or account contact information changes, the Company requires the requesting party to verify their identity against at least three of the following factors on file:

- LaCelle 3 Media LLC Account ID
- A DID number provisioned on the client's account
- E911 registered service address
- Email address on the account
- Voicemail-to-email address configured on the line, if any
- Call forwarding number on file, if any
- Date a line on the account was activated

### 3.5 Ongoing Re-Verification

The Company may re-verify existing clients when red flags appear, including but not limited to sudden call-volume

spikes, complaints, traceback requests, unusual destination patterns, caller ID irregularities, or account activity inconsistent with the client's stated use case(s). Clients failing to satisfy re-verification requirements are subject to service restriction or termination.

#### **Section 4 – Number Authorization and Caller ID Controls**

Clients provisioned through the Company may only use telephone numbers assigned by the Company, ported in by the client, or other numbers the client demonstrably owns, controls, or are otherwise authorized to use. The Company prohibits misleading caller ID presentation, unauthorized number use, and spoofing in violation of 47 U.S. Code § 227(e) (Truth in Caller ID Act) and 47 CFR § 64.1604.

The Company configures caller ID display at the account level, and if applicable, at individual call routing levels in the VoIP.ms reseller portal. Under the Company's standard managed service model, inbound calls forwarded to a client's personal device display the client's managed DID number rather than the caller's number, enabling the client to identify managed business calls. This configuration does not alter the caller ID presented to external parties receiving outbound calls from the client's DID; the outbound caller ID is the client's provisioned DID number, which is a VoIP.ms-assigned number the client is authorized to use.

#### **Section 5 – Acceptable Use Policy and Prohibited Conduct**

The Company's client service agreement incorporates an Acceptable Use Policy (AUP) that explicitly prohibits the following activities on LaCelle 3 Media LLC-managed lines:

- Automated or robocall dialing campaigns of any kind, including predictive dialers, auto-dialers, and pre-recorded message campaigns, unless the client can demonstrably prove the numbers being called have consented to receiving calls of this nature, or that it is for a demonstrable emergency situation
- Telemarketing calls to numbers on the National Do Not Call Registry without documented prior express written consent from the called party
- Transmission of calls with spoofed, falsified, or misleading caller ID information in violation of 47 U.S. Code § 227(e) (Truth in Caller ID Act) and 47 CFR § 64.1604.
- Any use that constitutes a violation of the TCPA, 47 U.S. Code § 227, or implementing FCC regulations
- Any use that facilitates illegal robocall activity, caller ID spoofing, or telephone fraud
- Evasion of network-level call-blocking or filtering systems
- Continued calling or messaging activity after opt-out or Do-Not-Call requests
- Resale or sub-licensing of LaCelle 3 Media LLC-managed lines to third parties without prior written authorization from the Company
- Use of LaCelle 3 Media LLC-managed lines for purposes inconsistent with the stated intended use provided during client onboarding.

Any violation of the Acceptable Use Policy constitutes grounds for immediate suspension or termination of service without prior notice. The Company will terminate service to any client found to be originating illegal robocalls and will not reactivate service until the issue is fully resolved to the Company's satisfaction and, where applicable, to the satisfaction of relevant regulatory authorities.

## **Section 6 – Do-Not-Originate (DNO) Compliance**

The Company acknowledges the Do-Not-Originate framework and implements the following measures:

- The Company's service agreement prohibits clients from originating calls that purport to originate from invalid, unallocated, or unassigned numbers
- The Company prohibits caller ID spoofing of numbers appearing on industry-recognized DNO lists, including numbers used by government agencies, financial institutions, and emergency services that do not originate outbound calls
- The Company cooperates with DNO requests received from the Industry Traceback Group (ITG) and will promptly block any client number identified as a DNO violation
- The Company monitors VoIP.ms' DNO-related protections as part of its annual vendor compliance review

## **Section 7 – Traffic Monitoring and Anomaly Detection**

### **7.1 Sub-Account Usage Monitoring**

The Company monitors client sub-account usage through the VoIP.ms reseller portal. Each client sub-account generates call detail records (CDRs) and usage logs accessible to the Company as the account administrator. The Company reviews these logs for usage patterns inconsistent with the client's stated intended use case as documented at onboarding. The Company does not currently use a separate third-party call analytics vendor; monitoring is conducted through VoIP.ms reseller portal analytics and manual CDR review. The Company will update this filing if a third-party analytics vendor is adopted.

### **7.2 Anomaly Indicators**

The Company's monitoring treats the following as anomaly indicators warranting immediate investigation:

- Outbound call volume significantly exceeding the client's stated and historical usage patterns
- High volumes of short-duration outbound calls (under 10 seconds average), which may indicate automated dialing activity
- Outbound calls to sequential or near-sequential phone numbers
- Abnormal answer-seizure ratios inconsistent with stated business use
- Caller ID presentation inconsistent with the client's provisioned DID number
- Sudden, unexplained traffic spikes inconsistent with the client's declared use case
- Outbound call activity to numbers appearing on known Do Not Call or Do Not Originate lists

### **7.3 Response Procedures**

Upon detection of an anomaly indicator, the Company will:

- Immediately review the affected sub-account's call records through the VoIP.ms reseller portal
- Attempt to contact the client through verified account contact information to obtain an explanation
- Suspend the affected sub-account's outbound calling capability if the anomaly cannot be satisfactorily explained
- Escalate to VoIP.ms for carrier-level investigation if warranted
- Document all findings and actions taken in the Company's internal ticket tracking system (Jira Service Desk, project TEL)

- Cooperate with any FCC or ITG traceback request related to the traffic in question

## **Section 8 – Traceback Response Procedures**

The Company commits to full cooperation with the Industry Traceback Group (ITG) and FCC enforcement proceedings in accordance with 47 CFR § 64.1200(n) and the traceback requirements established under the TRACED Act, Public Law 116-105.

In accordance with 47 CFR § 64.6305(e), the Company has designated the following point of contact to receive notice of any illegal robocall traffic or other robocall mitigation-related issues:

|                                               |                                                           |
|-----------------------------------------------|-----------------------------------------------------------|
| <b>Attention:</b>                             | Hayden LaCelle, LLC Executor / Owner, LaCelle 3 Media LLC |
| <b>Principal Business Office Address</b>      | 645 NE Campus St, APT E, Pullman, WA 99163                |
| <b>Principal Business Office Phone Number</b> | +1 (509) 715-0572, option 2                               |
| <b>Email Address</b>                          | techops.telephony@lacelle3.com                            |

### 8.1 Traceback Response Commitment

Upon receipt of a traceback request from the ITG, FCC, law enforcement, or any authorized entity, the Company will:

1. Manually acknowledge the receipt of the traceback request within 24 hours, not counting the automated response from the ticketing system which auto responds to emails sent to techops.telephony@lacelle3.com
2. Identify the client sub-account associated with the call in question using the Company's client registry and VoIP.ms call records
3. Provide all available call records, account information, and client identification data responsive to the traceback request within the timeframes required under applicable FCC laws
4. Suspend the implicated sub-account pending investigation if the traceback evidence suggests illegal robocall activity
5. Notify the client of the traceback inquiry and the basis for any service suspension
6. Document all traceback requests and the Company's responses in the TEL Jira Service Desk compliance queue
7. Cooperate fully with any subsequent FCC enforcement investigation

### 8.2 Record Retention

The Company retains client account records, service agreements, Know Your Customer documentation, and call records for a minimum of four years from the date of service termination, consistent with emerging Know Your Upstream Provider record retention requirements and standard record retention practices for telecommunications providers. Call records accessible through the VoIP.ms reseller portal are retained per VoIP.ms' data retention policies.

## **Section 9 – Upstream Provider Compliance and Know Your Upstream Provider (KYUP)**

### 9.1 Regulatory Context

The Company acknowledges its obligations under the FCC’s Know Your Upstream Provider (KYUP) framework, including the baseline KYUP requirements currently in effect under the Advanced Methods to Target and Eliminate Unlawful Robocalls proceeding (CG Docket No. 17-59) and the Call Authentication Trust Anchor, Seventh Report and Order (WC Docket No. 17-97), and the proposed expanded requirements under the Further Notice of Proposed Rulemaking adopted at the FCC’s May 20, 2026 Open Meeting. The Company commits to monitoring the development of final KYUP rules and updating this mitigation plan accordingly upon adoption of final rules.

## 9.2 Upstream Provider Identification and Verification

The Company receives voice traffic exclusively from one upstream provider:

|                             |                                                           |
|-----------------------------|-----------------------------------------------------------|
| <b>Provider Name</b>        | 9171-5573 QUEBEC INC. (doing business as VoIP.ms)         |
| <b>Relationship</b>         | Wholesale carrier via the VoIP.ms Reseller Program        |
| <b>Provider Type</b>        | Facilities-based VoIP carrier                             |
| <b>RMD Filing Status</b>    | Active, confirmed in the FCC Robocall Mitigation Database |
| <b>STIR/SHAKEN Status</b>   | Implemented at carrier level (Attestation A and C)        |
| <b>Compliance Confirmed</b> | Written correspondence, ticket #IAE9JZ, June-July 2026    |

The Company has received written assurances from VoIP.ms confirming that VoIP.ms implements STIR/SHAKEN on its IP network, signs outbound calls using its own certificate with appropriate attestation levels, manages PSAP routing infrastructure for E911 services, handles 988 Suicide & Crisis Lifeline routing at the carrier level, and complies with FCC robocall mitigation requirements. These assurances are documented in writing and retained in the Company’s compliance records via its TEL and secondary CMS (Creator Media Services, the Company’s client-facing service division) Jira Service Desk projects.

## 9.3 Ongoing Upstream Provider Monitoring

The Company monitors VoIP.ms’ compliance posture through the following ongoing procedures:

- The Company verifies that VoIP.ms maintains an active, current filing in the FCC Robocall Mitigation Database as part of its annual vendor compliance review, conducted each year before the March 1 RMD recertification deadline
- The Company monitors for any FCC notices indicating that VoIP.ms’ STIR/SHAKEN Service Provider Code (SPC) token has been revoked or suspended
- The Company monitors FCC enforcement actions and public notices for any actions taken against 9171-5573 QUEBEC INC. (doing business as VoIP.ms) that would affect their ability to lawfully provide voice service
- The Company reviews VoIP.ms’ reseller program terms annually to confirm that the upstream carrier’s acceptable use and compliance obligations remain consistent with the Company’s own compliance commitments
- The Company monitors client sub-account usage logs for patterns suggesting that upstream traffic may be contributing to illegal robocall activity

#### 9.4 Remediation Procedures

In the event that the Company discovers that VoIP.ms has had its RMD filing removed, its SPC token revoked, or has become subject to FCC enforcement action affecting its ability to lawfully provide voice service, the Company will immediately cease accepting new traffic originating from VoIP.ms pending investigation, notify affected clients of the potential service disruption, investigate alternative upstream carrier arrangements, and update this robocall mitigation plan to reflect any changes to the upstream provider relationship.

### **Section 10 – E911 and 988 Compliance**

#### 10.1 E911 Obligations

The Company acknowledges its obligations under 47 CFR § 9.10 as an interconnected VoIP provider, which requires that the Company ensures 911 calls are transmitted to the appropriate Public Safety Answering Point (PSAP) under the same standard as an Incumbent Local Exchange Carrier (ILEC), regardless of whether the Company owns the underlying network infrastructure. This obligation has been confirmed by the Washington Utilities and Transportation Commission (UTC) in written correspondence dated June 30, 2026 (Rebecca Beaton, Senior Staff, Regulatory Services).

The Company fulfills this obligation through the following measures:

- E911 service is activated on every client DID line as a mandatory component of the Company's standard onboarding process – no DID line is delivered to a client without E911 activation
- E911 PSAP routing infrastructure is managed by VoIP.ms at the carrier level, as confirmed in writing by VoIP.ms (ticket #IAE9JZ, June 29, 2026)
- Each client's E911 registered service address is collected and verified at onboarding and recorded in the Company's client registry
- Clients are required to notify the Company immediately of any change to their primary place of use address; E911 address updates are verified with VoIP.ms before the corresponding support ticket is closed
- The Company provides explicit E911 limitations disclosure to all clients in the service agreement and client welcome materials, informing clients that VoIP E911 may not function during power outages or internet disruptions
- For clients using IP phones or PBX hardware, the Company verifies that the client's dial plan includes 988 as a recognized dialing pattern before signing off on the setup

#### 10.2 988 Suicide and Crisis Lifeline Obligations

The Company acknowledges its obligations under the FCC's 988 Suicide and Crisis Lifeline mandate (PS Docket Nos. 23-5 and 15-80; WC Docket No. 18-336), which requires all interconnected VoIP providers and resellers to ensure that 988 calls are routed to the National Suicide and Crisis Lifeline regardless of facilities ownership. This obligation was confirmed by the Washington UTC in written correspondence dated June 30, 2026. VoIP.ms has confirmed in writing (ticket #IAE9JZ, July 1, 2026) that 988 routing is handled at the carrier level for all reseller accounts and that no additional configuration is required on the Company's end under standard operating conditions.

### **Section 11 – Annual Recertification and Plan Updates**

The Company commits to reviewing, updating, and recertifying this Robocall Mitigation Plan in the FCC's Robocall Mitigation Database on or before March 1 of each calendar year, in accordance with the annual recertification

requirements established under FCC rules. Annual recertification is tracked as a recurring compliance task in the Company's internal ticket tracking system via the TEL Jira Service Desk project.

In the event of any material change to this plan, including changes to the Company's service offerings, upstream carrier relationships, STIR/SHAKEN implementation status, KYC procedures, business address, or contact information, the Company will update its RMD filing within ten (10) days of such change and notify relevant clients of any material updates as appropriate.

The Company will also monitor the development of final rules under the FCC's Know Your Customer FNPRM (adopted April 30, 2026), the Know Your Upstream Provider FNPRM (adopted May 20, 2026), and the proposed RMD framework changes (released July 1, 2026) and update this plan to reflect final requirements upon their adoption.

## **Section 12 - Certification**

I, Hayden Thomas LaCelle, Executor and Owner of LaCelle 3 Media LLC, certify under penalty of perjury that the information contained in this Robocall Mitigation Plan is true, accurate, and complete to the best of my knowledge, information, and belief, and that LaCelle 3 Media LLC has implemented and will maintain the robocall mitigation practices described herein. Specifically, I certify the following:

- (1) LaCelle 3 Media LLC has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (2) LaCelle 3 Media LLC is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (3) LaCelle 3 Media LLC's business name is LaCelle 3 Media LLC. The company has no other business names or DBA names currently in use.
- (4) LaCelle 3 Media LLC has not previously operated under any other business name.
- (5) The party responsible for addressing robocall-related issues is ATTN: Hayden LaCelle, LLC Executor / Owner, reachable at techops.telephony@lacelle3.com and +1 (509) 715-0572, option 2.
- (6) LaCelle 3 Media LLC has no parent company, affiliates, or subsidiaries.
- (7) No person or entity exercising management or control over LaCelle 3 Media LLC has had any FCC license denied or revoked or been subject to an FCC enforcement proceeding.
- (8) LaCelle 3 Media LLC's role in the call chain is that of a non-facilities-based interconnected VoIP reseller and voice service provider serving end users.
- (9) LaCelle 3 Media LLC has not implemented STIR/SHAKEN directly due to its classification as a non-facilities-based reseller, consistent with the exemption described in FCC 20-42, paragraph 40.
- (10) LaCelle 3 Media LLC relies on its upstream carrier, 9171-5573 QUEBEC INC. (doing business as VoIP.ms), for carrier-level STIR/SHAKEN implementation and has received written confirmation of that implementation.
- (11) The robocall mitigation practices described in this plan are reasonable and appropriate for LaCelle 3 Media LLC's scale and business model and can reasonably be expected to significantly reduce the origination of illegal robocalls.
- (12) LaCelle 3 Media LLC commits to annual recertification of this plan by March 1 of each year and updating this filing within ten (10) days of any material change.

**/s/ Hayden Thomas LaCelle**

**Hayden Thomas LaCelle**

**LLC Executor / Owner, LaCelle 3 Media LLC**

**Date: July 19, 2026**