



Robocall Mitigation Program Description

Company Name: JDH Technology Advisors, LLC

Filer Role: Voice Service Provider Without a STIR/SHAKEN Implementation Obligation

FCC Filing Option: Option 3 – No STIR/SHAKEN Implementation

1. Overview

JDH Technology Advisors, LLC delivers hosted VoIP solutions utilizing the 3CX platform for business customers. The Company does not obtain telephone numbering resources directly from NANPA and does not operate facilities-based interconnections with the Public Switched Telephone Network (PSTN). All outbound voice traffic is routed through the Company's upstream voice carrier, Skytel.

JDH Technology Advisors, LLC maintains this Robocall Mitigation Program to reduce the risk of illegal robocall activity on its network and to satisfy applicable FCC robocall mitigation requirements.

1.1 Basis for No Direct STIR/SHAKEN Implementation

JDH Technology Advisors, LLC is not operating under an extension pursuant to 47 CFR §64.6304. The Company does not directly implement STIR/SHAKEN because it does not control the carrier infrastructure, certificate management, or authentication systems required to perform cryptographic signing.

The Company provisions and manages hosted 3CX PBX environments for business customers and configures Skytel SIP trunk services within those deployments. While the PBX supplies the calling party number and other required SIP information, JDH Technology Advisors, LLC does not own or manage the underlying carrier network, PSTN connectivity, STIR/SHAKEN signing platform, or certificate authority infrastructure.

Skytel automatically applies STIR/SHAKEN authentication to eligible outbound calls when the necessary SIP information is provided. Skytel validates telephone numbers assigned to the account, determines the appropriate attestation level, including Full (A) Attestation where applicable, and signs outbound calls before delivering them to the PSTN. Skytel also validates inbound STIR/SHAKEN Identity headers.

Accordingly, JDH Technology Advisors, LLC certifies that it does not directly implement STIR/SHAKEN because these carrier-level authentication functions are performed entirely by Skyetel.

2. Know Your Customer (KYC)

JDH Technology Advisors, LLC provides VoIP services exclusively to legitimate business customers. Residential service, anonymous accounts, prepaid offerings, and high-volume mass-calling operations are not supported.

2.1 Customer Onboarding

Before outbound calling privileges are enabled, each new customer completes a verification process that includes:

Business Verification

- Collection of the legal business name, DBA (if applicable), physical address, and primary contact information.
- Validation of one or more of the following:
 - Employer Identification Number (EIN)
 - State business registration
 - Other government-issued documentation
- Review of the customer's website and email domain to confirm consistency with the represented business.

Service Use Review

Customers must provide a description of how the service will be used.

Expected calling volumes, destinations, and concurrent call requirements are reviewed to ensure they align with normal business operations.

The following activities are prohibited:

- Robocall campaigns
- Lead-generation dialing
- Bulk unsolicited outbound calling
- Any activity that violates the TCPA or other applicable federal or state laws

Authorized Representative Verification

- Verification of the primary business contact through direct communication by phone or video.
- Confirmation that the individual has authority to act on behalf of the business.

Service activation does not occur until all verification steps have been successfully completed.

2.2 Existing Customer Reviews

The Company's KYC procedures apply to both prospective and existing customers.

Existing accounts are periodically reviewed to verify:

- Business identity
- Contact information
- Intended service usage
- Calling behavior
- Continued agreement with the Company's Terms of Service prohibiting illegal robocalling

If requested information cannot be verified or suspicious activity is identified, JDH Technology Advisors, LLC may suspend, restrict, or terminate service until compliance has been confirmed.

2.3 Monitoring Tools and Upstream Providers

JDH Technology Advisors, LLC does not currently utilize an independent robocall analytics platform.

Instead, the Company relies on:

Skyetel

- Call Detail Records (CDRs)
- Fraud detection and traffic monitoring capabilities
- Automatic STIR/SHAKEN authentication and attestation assignment

3CX Platform and Internal Monitoring

- Call reporting and logging

- Traffic analysis
- Alerts for abnormal calling activity
- Detection of unusual calling patterns such as excessive call volumes or short-duration calls

These tools provide ongoing visibility into customer traffic and assist in identifying potentially unlawful robocall activity.

2.4 Ongoing Compliance

Customer verification is an ongoing process.

When suspicious activity is detected, the Company may:

- Review account activity and call records
- Request additional information from the customer
- Temporarily block traffic
- Rate-limit outbound calling
- Suspend or terminate services when warranted

Accounts associated with confirmed illegal robocalling or customers unwilling to cooperate will remain suspended until compliance has been demonstrated.

3. Traffic Monitoring and Mitigation

3.1 Continuous Monitoring

The Company monitors for indicators including:

- Unexpected increases in outbound call volume
- Large numbers of short-duration calls
- Repeated calls to identical destinations
- Calling behavior consistent with robocall campaigns
- Customer complaints or traceback notifications

3.2 Mitigation Procedures

When suspicious traffic is identified, JDH Technology Advisors, LLC will:

Review

- Analyze Call Detail Records.
- Compare activity against expected customer behavior.

Customer Communication

- Contact the customer for clarification.
- Reinforce compliance obligations.

Traffic Controls

- Block suspicious numbers or destinations.
- Apply outbound rate limits.
- Disable affected SIP trunks when necessary.

Escalation

- Suspend or terminate non-compliant accounts.
- Restore service only after the issue has been resolved and compliance verified.

4. Traceback Cooperation

JDH Technology Advisors, LLC will cooperate with authorized traceback requests by:

- Responding within 24 hours whenever practical.
- Providing information necessary to identify the origin of suspicious traffic.
- Working with upstream providers to assist in investigations involving potentially unlawful robocalls.

5. Conclusion

JDH Technology Advisors, LLC does not directly implement STIR/SHAKEN because the required carrier authentication infrastructure is operated by its upstream provider, Skyetel. Skyetel performs authentication, attestation, cryptographic signing, and certificate management on outbound traffic.

JDH Technology Advisors, LLC remains responsible for customer due diligence, ongoing traffic monitoring, mitigation of suspicious activity, and cooperation with traceback requests. These procedures are intended to help prevent the Company's services from being used to originate or facilitate illegal robocall traffic while maintaining compliance with applicable FCC regulations.

