
CEJAY TECH LLC

Robocall Mitigation Program Description

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SECTION 1 — COMPANY OVERVIEW

CeJay Tech LLC is a limited liability company duly organized and existing under applicable state law. CeJay Tech LLC operates as a Managed Service Provider (MSP) specializing in cloud-hosted business communications solutions, with its primary commercial offering being a Hosted Private Branch Exchange (Hosted PBX) service delivered to small and medium-sized business (SMB) customers. CeJay Tech LLC serves a customer base consisting primarily of local and regional businesses seeking professionally managed business telephone services without the capital expenditure or operational burden of on-premises PBX equipment.

CeJay Tech LLC's Hosted PBX platform is delivered as a cloud-based managed service. Business customers access voice services through IP-based endpoints — including IP desk telephones, software-based telephone clients (softphones), and analog telephone adapters (ATAs) — that connect to CeJay Tech LLC's cloud-hosted PBX platform over the public Internet or private data connections. Outbound and inbound public switched telephone network (PSTN) call connectivity is provided through Session Initiation Protocol (SIP) trunking services obtained from one or more upstream SIP carrier providers. CeJay Tech LLC does not own, operate, or control physical switching equipment, transmission facilities, or backbone network infrastructure. All physical call transport and PSTN interconnection is performed by CeJay Tech LLC's upstream SIP carrier(s).

CeJay Tech LLC constitutes a "voice service provider" as that term is defined under **47 CFR § 64.6300**, in that it provides a service that enables real-time, two-way voice communications using Internet Protocol (IP). As a voice service provider, CeJay Tech LLC acknowledges its obligations under **47 CFR § 64.6305** with respect to robocall mitigation, and has adopted this Robocall Mitigation Program Description to fulfill those obligations. CeJay Tech LLC operates at a scale well below 100,000 subscriber lines in service and is accordingly classified as a small voice service provider for purposes of applicable FCC rules.

SECTION 2 — STIR/SHAKEN IMPLEMENTATION STATUS

CeJay Tech LLC has **not** independently implemented the STIR/SHAKEN call authentication framework on its own network infrastructure. This determination is the result of CeJay Tech LLC's network architecture as a non-facilities-based voice service provider. Because CeJay Tech LLC does not own or operate the underlying physical network infrastructure through which calls are transported, CeJay Tech LLC does not possess the technical capability to independently sign outbound calls with STIR/SHAKEN attestation credentials on its own behalf at the network level.

CeJay Tech LLC's Hosted PBX platform relies upon an upstream SIP carrier for all call transport and PSTN interconnection. STIR/SHAKEN call authentication attestation signing is performed by CeJay Tech LLC's upstream SIP carrier at the point of call origination into the PSTN. CeJay Tech LLC's upstream SIP carrier holds a valid Service Provider Code (SPC) token issued by the STI Policy Administrator and maintains its own active certification and filing in the FCC Robocall Mitigation Database (RMD) pursuant to **47 CFR § 64.6304** and **47 CFR § 64.6305**.

CeJay Tech LLC's non-implementation of independent STIR/SHAKEN signing is consistent with and supported by the following exemption provisions under Commission rules:

- **47 CFR § 64.6304(a)** — *Small Voice Service Provider Exemption*: CeJay Tech LLC qualifies as a small voice service provider with fewer than 100,000 subscriber lines in service, and thus is not required to independently implement STIR/SHAKEN where such implementation is not technically feasible or otherwise applicable to its network architecture.
- **47 CFR § 64.6304(d)** — *Non-IP / Non-Facilities-Based Network Limitation*: To the extent that CeJay Tech LLC's network architecture, as a non-facilities-based provider relying entirely upon an upstream carrier for call transport, does not permit direct implementation of STIR/SHAKEN at the network level, CeJay Tech LLC is exempt from independent STIR/SHAKEN implementation obligations, provided that it has

implemented a robocall mitigation program consistent with the requirements of **47 CFR § 64.6305(a)**.

Notwithstanding its non-implementation of independent STIR/SHAKEN signing, CeJay Tech LLC actively monitors the RMD filing status and SPC token validity of its upstream SIP carrier(s) on a regular basis. CeJay Tech LLC will promptly address any lapse or deficiency identified in the upstream carrier's RMD certification status through appropriate contractual and operational channels, including, if necessary, transitioning to an alternative compliant upstream carrier.

CeJay Tech LLC affirms that, in lieu of independent STIR/SHAKEN implementation, it has adopted and is implementing the robust Robocall Mitigation Program described in this document, consistent with the requirements of **47 CFR § 64.6305(a)**, encompassing customer vetting, contractual prohibitions, traffic monitoring, enforcement actions, and traceback cooperation, as fully described in the sections that follow.

SECTION 3 — ROBOCALL MITIGATION PROGRAM OVERVIEW

CeJay Tech LLC has established a formal Robocall Mitigation Program (the "Program") the purpose of which is to prevent, detect, and stop the origination of illegal robocall traffic from CeJay Tech LLC's Hosted PBX platform and its affiliated customer accounts. The Program reflects CeJay Tech LLC's commitment to responsible voice service provision and its recognition that voice service providers occupy a critical role in the broader effort to protect consumers from the harm caused by illegal robocall campaigns.

The Program is structured as a layered, defense-in-depth approach comprising the following core components:

- **Customer Vetting and Know Your Customer (KYC) Procedures:** Screening and verification of prospective customers prior to service activation to identify and exclude bad actors before they gain access to CeJay Tech LLC's platform.

- **Contractual Prohibitions:** Explicit, enforceable prohibitions embedded in all customer service agreements against the use of CeJay Tech LLC's services to originate illegal robocalls, engage in caller ID spoofing, or violate the Telephone Consumer Protection Act (TCPA) or other applicable law.
- **Ongoing Traffic Monitoring and Analysis:** Periodic review of call traffic patterns across customer accounts to identify anomalous activity indicative of illegal robocalling, using call detail record (CDR) analytics and coordination with the upstream SIP carrier's network-level monitoring systems.
- **Escalating Enforcement Actions:** A structured response protocol — ranging from written notice to immediate service termination — applicable to customers found to be engaging in or facilitating illegal robocall activity.
- **Traceback Cooperation:** Full and timely cooperation with the FCC, law enforcement agencies, and the USTelecom Industry Traceback Group (ITG) in response to traceback requests and investigations concerning illegal robocall traffic.

Each of these program components is described in detail in the sections that follow. CeJay Tech LLC reviews this Program and all associated policies and procedures at least once per calendar year and updates them as necessary to reflect changes in applicable FCC rules, operational developments, or lessons derived from enforcement or traceback experience.

SECTION 4 — CUSTOMER VETTING AND KNOW YOUR CUSTOMER (KYC) PROCEDURES

4.1 Pre-Activation Screening

CeJay Tech LLC requires all prospective business customers to complete a written service application prior to the activation of any Hosted PBX service. The service application is designed to establish the identity, legitimacy, and intended use of each prospective customer prior to that customer being granted access to CeJay Tech LLC's voice platform. The service application requires the following information, at minimum:

- Full legal business name and any trade names or "doing business as" (DBA) designations;
- Primary business address and, where applicable, additional locations to be served;
- Federal Employer Identification Number (EIN) or Tax Identification Number;
- Name, title, and contact information of the authorized business representative executing the service agreement;
- Nature of the applicant's business, including a description of the primary products or services offered;
- Intended use of the Hosted PBX lines being requested; and
- Expected outbound call volumes and general calling patterns.

Upon receipt of a completed service application, CeJay Tech LLC verifies the applicant's information through the following procedures: (i) verification of business registration through applicable state or county records, Secretary of State database lookups, or equivalent public business registration resources; (ii) verification of the identity and authorization of the individual executing the service agreement; and (iii) assessment of the legitimacy of the applicant's stated business purpose and intended use of voice services. CeJay Tech LLC additionally employs commercially available business verification resources and databases to cross-reference applicant information as part of its standard screening process.

Service applications submitted by prospective customers operating in industries known to present elevated risk of illegal robocall activity — including without limitation debt collection, outbound telemarketing, political dialing operations, and financial services cold-calling — are subject to enhanced review. Enhanced review may include requests for additional documentation such as prior compliance records, applicable federal or state licensure, TCPA compliance policies, or written attestations regarding the lawful nature of the applicant's anticipated calling practices. CeJay Tech LLC reserves the right to deny service to any applicant whose application raises concerns that cannot be adequately resolved through the screening process.

4.2 High-Volume Caller Screening

Prospective customers requesting more than ten (10) Direct Inward Dialing (DID) telephone lines, or who indicate during the application process that their intended use includes outbound call center operations or high-volume outbound dialing programs, are subject to enhanced due diligence procedures in addition to the standard pre-activation screening described in Section 4.1. Such customers must provide, as a condition of service activation:

- A written description of their outbound calling program, including the categories of parties to be called, the general substance of calls, and the anticipated frequency and volume of outbound calls;
- Documentation of any applicable compliance framework maintained by the customer with respect to the Telephone Consumer Protection Act (TCPA), including consent management procedures and Do-Not-Call (DNC) list compliance procedures where the customer engages in solicitation activities; and
- A written attestation, signed by an authorized representative of the customer, confirming that the customer's use of CeJay Tech LLC's services will at all times comply with applicable federal and state laws governing telephone solicitation, robocalling, and caller identification.

CeJay Tech LLC retains all documentation obtained during enhanced due diligence review as part of the customer's account record. This documentation is available to support traceback investigations or FCC inquiries as described in Section 7 of this Program.

4.3 Contractual Prohibitions

All customer service agreements executed by CeJay Tech LLC include explicit, enforceable contractual prohibitions governing the permissible use of CeJay Tech LLC's Hosted PBX services. These prohibitions are presented to customers in plain, unambiguous language and are acknowledged in writing by an authorized representative of the customer at the time the service agreement is executed. The contractual prohibitions include, without limitation, the following:

- Prohibition on using CeJay Tech LLC's services to originate, transmit, or facilitate illegal robocalls as defined under applicable federal law, including the Telephone Consumer Protection Act (**47 U.S.C. § 227**), and Commission rules promulgated thereunder;
- Prohibition on engaging in caller identification spoofing in violation of the Truth in Caller ID Act (**47 U.S.C. § 227b**), including the transmission of false or misleading caller identification information with the intent to defraud, cause harm, or wrongfully obtain anything of value;
- Prohibition on initiating calls to consumers in violation of the Telephone Consumer Protection Act, including calls made using an automatic telephone dialing system or pre-recorded voice message without the requisite prior express consent of the called party;
- Prohibition on transmitting pre-recorded or artificial voice messages to consumers without having obtained the legally required prior express written consent or other applicable legal basis for such communications;
- Prohibition on any use of CeJay Tech LLC's services to harass, threaten, defraud, or cause harm to call recipients; and
- Prohibition on any use of CeJay Tech LLC's services in furtherance of any scheme prohibited under federal or applicable state telecommunications law.

Customer service agreements provide that any violation of the foregoing contractual prohibitions constitutes a material breach of the service agreement and grounds for immediate suspension and/or termination of service, at CeJay Tech LLC's sole discretion, without further notice or liability to CeJay Tech LLC. All customers acknowledge these obligations in writing at the time of service agreement execution, and such written acknowledgment is retained as part of the customer account record.

SECTION 5 — TRAFFIC MONITORING AND ANALYSIS

5.1 Ongoing Call Traffic Review

CeJay Tech LLC conducts periodic reviews of call traffic patterns associated with its hosted PBX customer accounts as a core component of its Robocall Mitigation Program. The purpose of these reviews is to identify anomalous or suspicious traffic patterns that may be indicative of illegal robocall activity originating from a customer account. Traffic reviews are conducted using call detail record (CDR) data generated by CeJay Tech LLC's Hosted PBX platform and supplemented by network-level traffic analysis performed by CeJay Tech LLC's upstream SIP carrier.

During periodic traffic reviews, CeJay Tech LLC focuses on the identification of the following categories of anomalous patterns, which are recognized indicators of potential illegal robocall activity:

- Sudden, unexplained spikes in outbound call volume from a customer account, particularly where such spikes are inconsistent with the customer's stated business purpose or historical call patterns;
- Unusually short call durations across a high volume of outbound calls, which may be indicative of automated or robocall dialing behavior;
- Elevated call attempt-to-answer ratios, suggesting that calls are being placed at a volume or frequency inconsistent with human-initiated dialing;
- Sequential or near-sequential number dialing patterns across outbound calls from a customer account;
- High volumes of calls to numbers known to be registered on applicable Do-Not-Call lists or identified as reassigned subscriber numbers; and
- Any other traffic pattern that, in CeJay Tech LLC's reasonable assessment, is inconsistent with the legitimate commercial use of a business telephone service.

5.2 Analytics and Detection Tools

CeJay Tech LLC utilizes the reporting, analytics, and call detail record (CDR) capabilities built into its Hosted PBX platform to conduct traffic monitoring and analysis. These platform-native tools provide CeJay Tech LLC with visibility into call volumes, call durations, call attempt ratios, and calling number patterns across customer accounts, thereby enabling CeJay Tech LLC to identify deviations from expected traffic behavior.

In addition to platform-native monitoring, CeJay Tech LLC works in coordination with its upstream SIP carrier, which employs network-level call analytics and automated flagging systems designed to detect and report suspicious traffic patterns at the carrier level. CeJay Tech LLC reviews any traffic alerts, flagging reports, or notifications of suspicious activity communicated by its upstream SIP carrier and treats such reports as grounds for initiating account-level review pursuant to the customer inquiry process described in Section 5.3. This coordinated, two-tiered monitoring approach — combining platform-level CDR analysis with upstream network-level analytics — provides CeJay Tech LLC with a comprehensive means of detecting potential illegal robocall traffic traversing its platform.

5.3 Customer Inquiry Process

Upon identification of suspicious traffic patterns through periodic traffic review or upstream carrier notification, CeJay Tech LLC initiates a formal customer inquiry process. CeJay Tech LLC contacts the account holder of the relevant customer account — using the primary contact information on file — to advise the customer of the identified traffic concern and to request a written explanation of the traffic pattern and, where applicable, documentation supporting the legitimate business purpose of the activity in question.

The customer is afforded a reasonable opportunity to respond, not to exceed forty-eight (48) hours from the transmission of the initial inquiry, unless CeJay Tech LLC determines that the nature and severity of the suspicious traffic pattern warrants a shorter response window or immediate enforcement action under Section 6.2 of this Program. If the customer provides a timely and satisfactory written explanation demonstrating a legitimate business basis for the identified traffic pattern, CeJay Tech LLC documents the response and closes the inquiry without further action. If the customer fails to respond within the prescribed time period, provides an insufficient or implausible explanation, or provides an explanation that discloses

or implies unlawful calling activity, CeJay Tech LLC proceeds to enforcement actions as described in Section 6 of this Program.

SECTION 6 — ENFORCEMENT ACTIONS

6.1 Escalating Response Protocol

CeJay Tech LLC has established a structured, escalating enforcement response protocol applicable to customer accounts found to be engaged in, or suspected of engaging in, illegal robocall activity. The protocol is designed to ensure that CeJay Tech LLC's response is proportionate to the nature, severity, and certainty of the identified concern, while ensuring that confirmed violations are addressed swiftly and decisively. The enforcement levels are as follows:

- **Level 1 — Formal Warning:** CeJay Tech LLC issues a written or electronic formal notice to the customer advising of the identified traffic concern, citing the applicable contractual prohibitions, and requiring the customer to provide a written explanation and implement corrective measures within forty-eight (48) hours. The formal warning is documented in the customer account record.
- **Level 2 — Traffic Limitation:** Where a customer fails to respond to a Level 1 warning or the response provided is unsatisfactory, or where the severity of the suspected activity warrants an intermediate response, CeJay Tech LLC imposes a temporary restriction on the customer's outbound call volume capacity or available DID lines pending the completion of the account investigation. Traffic limitations remain in effect until the investigation is resolved.
- **Level 3 — Service Suspension:** Where there is a reasonable basis to believe that a customer account is actively being used to originate illegal robocall traffic, CeJay Tech LLC immediately suspends all outbound calling capability for the affected account pending the outcome of the investigation. Service suspension does not

affect the customer's ability to receive inbound calls unless circumstances warrant a full service suspension.

- **Level 4 — Service Termination:** Upon confirmation of a violation of the contractual prohibitions set forth in Section 4.3 of this Program, CeJay Tech LLC permanently terminates the customer's service agreement. Upon termination, CeJay Tech LLC notifies its upstream SIP carrier to cease routing calls associated with the terminated customer account. All account records and call detail records associated with the terminated account are retained in accordance with the record retention requirements described in Section 7 of this Program.

6.2 Emergency Suspension

CeJay Tech LLC expressly reserves the right to impose an immediate, emergency suspension of outbound calling services for any customer account where credible evidence of illegal robocall activity exists, without the requirement of prior warning or completion of any preliminary enforcement level. Circumstances that may give rise to an emergency suspension include, without limitation, situations in which the FCC Enforcement Bureau, a law enforcement agency, or the USTelecom Industry Traceback Group (ITG) has directly notified CeJay Tech LLC of illegal robocall traffic originating from a specific customer account, or where CeJay Tech LLC independently identifies traffic patterns of such severity or volume that immediate action is necessary to prevent ongoing consumer harm.

Following the imposition of an emergency suspension, CeJay Tech LLC will, within twenty-four (24) hours, transmit written notice to the affected customer explaining the basis for the emergency suspension and advising the customer of the opportunity to provide explanation or documentation in response. The emergency suspension remains in effect pending completion of CeJay Tech LLC's investigation, regardless of any explanation or documentation provided by the customer, and may be escalated to service termination pursuant to Level 4 of the enforcement protocol upon confirmation of a violation.

6.3 Reporting Confirmed Violations

In cases where CeJay Tech LLC confirms, through its investigation, that a customer has used CeJay Tech LLC's services to originate illegal robocalls in violation of the customer's service agreement and applicable law, CeJay Tech LLC will take the following actions:

- Report the confirmed violation and the identity of the violating customer account to CeJay Tech LLC's upstream SIP carrier, so that the carrier may take appropriate network-level action to prevent further routing of calls from the violating account;
- Cooperate fully with any investigation initiated by the FCC Enforcement Bureau, federal or state law enforcement agencies, or the USTelecom Industry Traceback Group (ITG) in connection with the illegal robocall activity, including providing call detail records, account information, and any other responsive documentation in CeJay Tech LLC's possession; and
- Retain all relevant call detail records, customer account records, service application documentation, and investigation records for the full duration of any pending investigation, and in any event for no less than the minimum record retention period specified in Section 7 of this Program.

SECTION 7 — TRACEBACK COOPERATION

CeJay Tech LLC is committed to full and timely cooperation with all traceback requests received from the FCC, federal and state law enforcement agencies, and the USTelecom Industry Traceback Group (ITG), which is the Commission-recognized industry traceback consortium for purposes of **47 CFR § 64.6305(b)**. CeJay Tech LLC recognizes that prompt and complete participation in the traceback process is essential to the investigation and disruption of illegal robocall campaigns and to the identification of bad actors throughout the call origination and routing chain.

CeJay Tech LLC commits to the following traceback cooperation standards:

- **Response Time:** CeJay Tech LLC will respond to all traceback requests received from the FCC, law enforcement, or the ITG within twenty-four (24) hours of receipt of the traceback inquiry, or such shorter period as may be required by the requesting party or the circumstances of the investigation.
- **Designated Point of Contact:** CeJay Tech LLC designates a primary point of contact — holding the title of Director of Operations / Compliance Contact — who is responsible for receiving, triaging, and responding to all traceback requests, FCC inquiries, and law enforcement contacts. This individual's contact information will be maintained current in CeJay Tech LLC's FCC RMD filing.
- **Information to Be Provided:** In response to a traceback request, CeJay Tech LLC will provide, to the extent available and applicable: (i) call detail records for the identified calls, including calling and called numbers, call timestamps, and call duration; (ii) customer account information associated with the originating traffic, including the customer's legal name, contact information, and service agreement details; and (iii) upstream routing information for the identified calls, including identification of the upstream carrier through which the calls were transported.
- **Record Retention:** CeJay Tech LLC retains call detail records for a minimum period of twenty-four (24) months from the date of the call event. This retention period is designed to ensure that records are available to support traceback investigations initiated within the applicable investigation window. Customer account records — including service applications, service agreements, and account history — are retained for a period of no less than twenty-four (24) months following the termination or expiration of the customer's service relationship with CeJay Tech LLC.
- **FCC Enforcement Bureau Cooperation:** CeJay Tech LLC will cooperate fully with any investigation or inquiry initiated by the FCC Enforcement Bureau concerning illegal robocall campaigns that may have used CeJay Tech LLC's platform, including

producing records, providing access to account information, and taking directed remedial actions as may be required by Commission staff.

SECTION 8 — NETWORK DESCRIPTION

8.1 Network Architecture

CeJay Tech LLC operates exclusively as a non-facilities-based voice service provider. CeJay Tech LLC does not own, operate, or control physical switching equipment, circuit transmission facilities, dedicated fiber or copper network infrastructure, or backbone network assets of any kind. CeJay Tech LLC's Hosted PBX service is delivered entirely through cloud-based software infrastructure hosted on commercial cloud computing platforms. Business customers access CeJay Tech LLC's Hosted PBX service through IP-based endpoints — including Session Initiation Protocol (SIP)-compatible IP desk telephones, software-based telephone clients (softphones) operating on computers or mobile devices, and analog telephone adapters (ATAs) enabling legacy telephony equipment to connect to the SIP-based hosted PBX platform — using the customer's existing broadband Internet connection or private data network.

Outbound calls placed by CeJay Tech LLC's hosted PBX customers are routed from CeJay Tech LLC's cloud-hosted PBX platform via SIP trunk to CeJay Tech LLC's upstream SIP carrier, which is responsible for completing the call to the PSTN and to the intended called party. Inbound calls to customer DID numbers are received by CeJay Tech LLC's upstream SIP carrier from the PSTN and are delivered to CeJay Tech LLC's hosted PBX platform via SIP trunk for routing to the appropriate customer endpoint.

8.2 Upstream Carrier Relationship

CeJay Tech LLC obtains all PSTN interconnection and call transport services from one or more upstream SIP trunk carrier providers. CeJay Tech LLC's upstream carrier(s) are responsible for physical call transport, PSTN interconnection, and the performance of STIR/SHAKEN call authentication attestation signing on originated calls at the network level,

as more fully described in Section 2 of this Program. CeJay Tech LLC has verified that its upstream SIP carrier(s) hold active FCC Robocall Mitigation Database certifications and valid SPC tokens, and CeJay Tech LLC monitors the RMD filing status of its upstream carrier(s) on a regular basis to confirm continued compliance.

CeJay Tech LLC's commercial agreements with its upstream SIP carrier(s) include provisions expressly requiring each upstream carrier to maintain compliance with applicable FCC rules governing call authentication, robocall mitigation, and STIR/SHAKEN implementation, including the filing and maintenance of a current and accurate RMD certification. In the event that CeJay Tech LLC determines that an upstream carrier is not in compliance with applicable FCC requirements, CeJay Tech LLC will take prompt corrective action, including requiring the carrier to cure the deficiency or transitioning to an alternative compliant upstream carrier provider.

8.3 DID Number Management

CeJay Tech LLC provides Direct Inward Dialing (DID) telephone numbers to its hosted PBX customers as part of its standard service offering. DID numbers are sourced by CeJay Tech LLC from its upstream SIP carrier and are assigned to specific customer accounts upon service activation. CeJay Tech LLC maintains complete records of all DID numbers assigned to each customer account, including the date of assignment, the customer account to which each number is assigned, and the current status of each number. Upon termination of a customer's service — whether by customer request or by CeJay Tech LLC pursuant to its enforcement authority — all DID numbers associated with the terminated account are returned to the upstream carrier's number pool and are no longer accessible by the former customer. CeJay Tech LLC ensures that reassigned DID numbers are not activated for new customers in a manner that could contribute to caller ID confusion or facilitate ongoing fraudulent calling campaigns associated with the prior account holder.

SECTION 9 — PROGRAM REVIEW AND UPDATES

CeJay Tech LLC is committed to maintaining a Robocall Mitigation Program that remains current, effective, and fully compliant with applicable FCC rules at all times. To that end, CeJay Tech LLC reviews this Robocall Mitigation Program Description, and all associated policies, procedures, and internal controls, at least once per calendar year. Annual reviews are conducted by CeJay Tech LLC's designated compliance contact, with the involvement of senior management as appropriate, and encompass an assessment of the following:

- Any changes in FCC rules, Commission orders, or enforcement guidance relating to robocall mitigation, STIR/SHAKEN, or voice service provider obligations that may necessitate updates to this Program;
- Any material changes in CeJay Tech LLC's business operations, network architecture, customer base composition, or upstream carrier relationships that may affect the sufficiency or accuracy of this Program or the related FCC RMD filing;
- Any lessons learned from enforcement actions taken against customer accounts during the preceding year, including any improvements to the customer vetting or traffic monitoring procedures that such experience may suggest;
- Any traceback requests received during the preceding year and the effectiveness of CeJay Tech LLC's response procedures; and
- Any communications received from the FCC, law enforcement, or the ITG relating to illegal robocall activity that may inform improvements to the Program.

Upon completion of the annual review, CeJay Tech LLC will update this Program Description as necessary and will promptly update its FCC Robocall Mitigation Database filing to reflect any material changes to the Program. CeJay Tech LLC is also committed to updating its FCC RMD filing on a non-scheduled basis whenever a material change to the Program or to the information contained in the RMD filing occurs outside of the annual review cycle, including changes to designated compliance contact information, upstream carrier relationships, or enforcement procedures. CeJay Tech LLC will at all times ensure that the version of this Program Description filed in the FCC Robocall Mitigation Database accurately represents CeJay Tech LLC's current robocall mitigation practices.

SECTION 10 — CERTIFICATION

Certification Statement

The undersigned, being an authorized representative of CeJay Tech LLC, hereby certifies that the information set forth in this Robocall Mitigation Program Description is true, accurate, and complete to the best of the undersigned's knowledge, information, and belief. The undersigned further certifies that CeJay Tech LLC has implemented the robocall mitigation program described herein and that CeJay Tech LLC is committed to maintaining and updating this program in accordance with applicable FCC rules and the ongoing requirements of **47 CFR § 64.6305**.

CeJay Tech LLC acknowledges that any false statement made in connection with this filing may subject CeJay Tech LLC and its responsible officers to civil and criminal penalties under **47 U.S.C. § 220**, and to any other penalties provided under applicable federal or state law. CeJay Tech LLC further acknowledges that the FCC may rely upon the representations made in this filing in connection with enforcement proceedings and regulatory determinations.

This Robocall Mitigation Program Description is submitted pursuant to **47 CFR § 64.6305(f)** for inclusion in the Federal Communications Commission Robocall Mitigation Database.

Authorized Signatory — CeJay Tech LLC

<i>Signature</i>	<i>Date</i>
Jose Uribe	7/27/2026

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