

Lightspeed Mobile

A DIVISION OF LIGHTSPEED TECH SYSTEMS, LLC · GREEN BAY, WISCONSIN

Robocall Mitigation Program Description

Filed with the FCC Robocall Mitigation Database pursuant to 47 CFR § 64.6305 · Effective August 2026

Filing entity	Lightspeed Tech Systems, LLC (operating the mobile service as "Lightspeed Mobile")
FCC Registration Number (FRN)	0038723656
Business address	2563 Development Dr, Green Bay, WI 54311, United States
Robocall mitigation contact	Jason Lauzer, Owner — jason@lightspeedtechsystems.com · (920) 518-3100
Provider type	Voice service provider (mobile virtual network operator / reseller serving business end-user customers)
Underlying network	AT&T Mobility, accessed through Atomic Mobile, Inc. (network/platform partner)

1. Overview

Lightspeed Tech Systems, LLC ("Lightspeed") provides mobile voice service to business end-user customers as a mobile virtual network operator (MVNO). Lightspeed does not own or operate originating network facilities; all voice traffic is carried and originated on the AT&T Mobility network, accessed through its platform partner, Atomic Mobile, Inc. This document describes the robocall mitigation program Lightspeed maintains under 47 CFR § 64.6305(a), including the reasonable steps it takes to avoid originating illegal robocall traffic and its commitment to cooperate with traceback and enforcement efforts.

2. STIR/SHAKEN Authentication Status and Basis for Non-Implementation

Lightspeed does not own or operate the IP network infrastructure on which STIR/SHAKEN call authentication is performed and therefore has **not implemented the STIR/SHAKEN authentication framework on any portion of its own network**. Caller identification authentication for all voice calls that Lightspeed's customers originate is performed by the underlying facilities-based originating provider, AT&T Mobility (accessed through Atomic Mobile, Inc.), which maintains a complete STIR/SHAKEN implementation.

As a mobile virtual network operator and reseller, Lightspeed does not have direct access to telephone numbering resources and cannot obtain a Service Provider Code (SPC) token under the STIR/SHAKEN Governance Authority's token-access policy. It is therefore incapable of participating in, or implementing, the STIR/SHAKEN authentication framework on its own behalf. Consistent with **47 CFR § 64.6304**, Lightspeed

is not required to implement STIR/SHAKEN, and it instead maintains the robocall mitigation program described in this document pursuant to 47 CFR § 64.6305(a). Lightspeed will revisit this status if it becomes capable of obtaining an SPC token or otherwise becomes subject to a STIR/SHAKEN implementation obligation.

3. Reasonable Steps to Avoid Originating Illegal Robocall Traffic

Lightspeed takes the following reasonable steps to prevent illegal robocalls and illegal spoofing from originating on service it provides:

- **Know-Your-Customer (KYC) vetting.** Lightspeed serves a closed base of vetted business customers only — it does not offer anonymous, self-service, or open online sign-up. Before activation, each customer is verified through a direct business relationship, a written service agreement, and confirmation of the customer's legitimate business identity. Lightspeed maintains records identifying each customer and the person responsible for the account.
- **Acceptable Use Policy.** Every customer agreement incorporates an Acceptable Use Policy that expressly prohibits using the service to originate illegal robocalls, to transmit unlawful or deceptive caller ID information (illegal spoofing), or to violate the TCPA, the Telephone Consumer Protection Act, or FCC rules. Violation is grounds for immediate suspension or termination.
- **Contractual anti-robocall obligations.** Lightspeed's downstream customer terms pass through the anti-robocall and lawful-use obligations required by its upstream agreements with Atomic Mobile and AT&T, and reserve Lightspeed's right to suspend or terminate any line generating illegal or fraudulent traffic.
- **Network analytics and monitoring.** Lightspeed relies on the call-analytics and fraud-detection capabilities of its underlying network operator, AT&T Mobility, and its platform partner, Atomic Mobile, to identify and block suspected illegal traffic. Lightspeed reviews usage data made available through the Atomic platform and investigates anomalous origination patterns (for example, abnormally high call volumes or short-duration mass calling) that are inconsistent with normal business use.
- **No wholesale or transit origination.** Lightspeed does not accept or originate traffic on behalf of other carriers or upstream voice providers; it serves only its own retail business subscribers. Should Lightspeed ever accept traffic from an upstream provider in the future, it will apply "know-your-upstream-provider" due diligence consistent with § 64.1200(n).
- **Prompt corrective action.** When Lightspeed identifies, or is notified of, illegal robocall traffic originating on a line it provides, it acts promptly to investigate and, where warranted, to block the traffic and suspend or terminate the offending line.

4. Traceback Cooperation

Lightspeed commits to **respond fully and within 24 hours** to all traceback requests from the Federal Communications Commission, from law enforcement, and from the industry traceback consortium (the Industry Traceback Group). Lightspeed will cooperate with those entities in identifying, investigating, and

stopping any illegal robocallers that use its service to originate calls, including by providing customer and call-detail information as permitted by law and by taking mitigation action against identified sources.

5. Cooperation with Enforcement

Lightspeed will cooperate with the Commission, law enforcement, and other authorized entities in efforts to investigate and stop illegal robocalls and illegal spoofing that involve its service, and will implement effective mitigation measures against any customer or line identified as a source of such traffic.

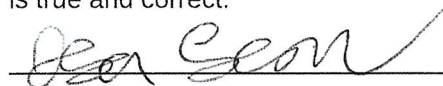
6. Regulatory History

Within the prior two years, Lightspeed Tech Systems, LLC has **not** been the subject of any formal Commission, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing relating to the transmission or facilitation of illegal robocalls or spoofing, nor of any deficient Robocall Mitigation Database certification or mitigation program description.

7. Point of Contact

Questions regarding this robocall mitigation program, and all traceback and enforcement correspondence, should be directed to: Jason Lauzer, Owner, Lightspeed Tech Systems, LLC — jason@lightspeedtechsystems.com, (920) 518-3100.

I certify, under penalty of perjury under the laws of the United States of America, that I am authorized to submit this robocall mitigation program description on behalf of Lightspeed Tech Systems, LLC, and that the foregoing is true and correct.



Jason Lauzer — Owner, Lightspeed Tech Systems,
LLC

Date: 8-7-2026