

WurfelIT LLC
ROBOCALL MITIGATION PLAN

Owner / Authorized Representative: REDACTED

I. Background

The Federal Communications Commission ("FCC" or "Commission") requires voice service providers and intermediate providers, including gateway providers, to file certifications and robocall mitigation program descriptions in the FCC Robocall Mitigation Database ("RMD") as applicable. See 47 C.F.R. § 64.6305.

WurfelIT LLC ("WURFELIT") maintains a robocall mitigation program designed to take reasonable steps to prevent its network and services from being used to originate, carry, or process illegal robocall traffic. WURFELIT commits to respond within 24 hours to traceback requests from the Commission, law enforcement, and the industry traceback consortium and to cooperate in investigations concerning illegal calls.

WURFELIT focuses its mitigation efforts on preventing calls that violate the Telephone Consumer Protection Act, the Truth in Caller ID Act, the Telemarketing Sales Rule, and other applicable federal and state requirements, including calls that use misleading or inaccurate caller identification information with intent to defraud, cause harm, or wrongfully obtain anything of value.

II. Provider Role and STIR/SHAKEN Status

WURFELIT operates as a voice service provider and wholesale intermediate provider, including gateway and non-gateway functions, serving business and wholesale communications customers.

At the time of this plan, WURFELIT is completing the technical and administrative steps required for STIR/SHAKEN participation, including the credentials and certificate needed to authenticate applicable calls. WURFELIT will implement STIR/SHAKEN on applicable IP portions of its network to the extent required by Commission rules. Until implementation is complete, and for traffic not subject to authentication, all calls are subject to the mitigation controls described in this plan. WURFELIT will ensure that its RMD certification accurately reflects its actual implementation status.

III. Know Your Customer (KYC) Standards

As part of customer onboarding and renewal, WURFELIT uses commercially reasonable measures to identify customers, understand their intended use of service, and evaluate whether they present an elevated risk of illegal call activity. Customers must complete a KYC review, execute a written service agreement, and provide regulatory or corporate documentation when applicable.

- Legal business identity, formation jurisdiction, and physical business address
- Primary business, technical, and compliance contacts
- Relevant regulatory identifiers and publicly available compliance information

REDACTED - ADDITIONAL KYC DATA ELEMENTS AND VERIFICATION METHODS

IV. Acceptable Use and Customer Obligations

All customers are contractually prohibited from using WURFELIT services for illegal, abusive, fraudulent, deceptive, or misleading activity. Prohibited activity includes unlawful telemarketing, violations of federal or state Do-Not-Call requirements, unauthorized prerecorded or artificial-voice calling, and spoofing or misrepresentation of caller identity.

Customers must use only telephone numbers they are authorized to use, must provide accurate calling-party information, and must cooperate promptly with compliance inquiries. WURFELIT reserves the right to restrict, suspend, or terminate service for violations or material compliance risks.

V. Telephone Number Authorization and Attestation Controls

WURFELIT requires customers to demonstrate authority to use calling telephone numbers and prohibits unauthorized, invalid, or spoofed caller IDs. When STIR/SHAKEN signing is enabled, WURFELIT will assign attestation based on its relationship with the customer, the customer's identity verification, and the customer's authority to use the calling number.

REDACTED - INTERNAL ATTESTATION DECISION CRITERIA AND REVIEW PROCEDURES

VI. Proactive Network and Traffic Monitoring

WURFELIT monitors traffic for indicators of unlawful or abusive calling and may use internal analysis and third-party tools to identify anomalous behavior, invalid caller identification, suspicious traffic patterns, high-risk destinations, repeated short-duration calls, unusual answer or completion patterns, and other indicators of potential illegal traffic.

REDACTED - SPECIFIC ANALYTICS, DATA SOURCES, VENDOR TOOLS, AND RISK THRESHOLDS

VII. Investigation and Enforcement Workflow

Potential issues may be identified through analytics, complaints, traceback notices, carrier notifications, customer reviews, or regulatory inquiries. WURFELIT evaluates available information and applies responsive measures proportionate to the apparent risk and severity.

REDACTED - INTERNAL ESCALATION TRIGGERS, INVESTIGATION STEPS, AND ENFORCEMENT THRESHOLDS

Available actions include requesting supporting documentation, restricting traffic or caller IDs, suspending service, terminating service, downgrading or withholding attestation, and notifying relevant partners or authorities when appropriate.

VIII. Repeat Offender and Upstream Provider Controls

WURFELIT may apply enhanced monitoring, restrictions, suspension, termination, blocking, or additional verification requirements to repeat offenders or customers associated with serious compliance concerns. WURFELIT also uses commercially reasonable due diligence when establishing or renewing relationships with upstream providers and will not knowingly accept traffic from providers that are prohibited or not properly listed in the RMD when a listing is required.

IX. Traceback Cooperation and Recordkeeping

WURFELIT commits to responding within 24 hours to traceback requests from the FCC, law enforcement, and the industry traceback consortium. WURFELIT will preserve and provide responsive records as legally permitted, cooperate fully with investigations, and take prompt corrective action when illegal robocall activity is identified.

WURFELIT maintains records reasonably necessary to administer its KYC, monitoring, investigation, enforcement, and traceback obligations and periodically reviews this plan for effectiveness and regulatory changes.

X. Responsible Officer

REDACTED - NAME AND SIGNATURE OF RESPONSIBLE OFFICER