

PAVE VOIP LLC

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Prepared for FCC Robocall Mitigation Database Filing

Effective Date: August 17, 2026

Company Identification

Legal Name	Pave VoIP LLC
FCC Registration Number (FRN)	0038778486
State of Organization	California
Primary Business Address	1139 N Sierra Bonita Ave, Pasadena, CA 91104
Provider Role	Voice Service Provider directly serving end users
STIR/SHAKEN Status	Fully implemented across the network
Robocall Compliance Contact	Hovig Sam Karakouzian, Chief Executive Officer
Email	hovig.sam@pavevoip.com
Telephone	+1 559-626-6350

Program Statement

Pave VoIP LLC ("Pave") maintains this Robocall Mitigation Program to take reasonable and effective steps to prevent its network from being used to originate illegal robocall traffic. The program applies to calls originated for Pave end users and is intended to satisfy the applicable requirements of 47 CFR §§ 64.6305 and 64.1200(n), together with applicable FCC caller-ID authentication and robocall mitigation rules. Pave prohibits use of its services for unlawful calling activity and may restrict, suspend, or terminate service when traffic presents material indicators of illegal or abusive use.

Pave further requires use of its services to comply with applicable federal and state laws and regulations, including caller-ID, consumer-protection, consent, do-not-call, and anti-spoofing requirements to the extent applicable to the relevant calling activity.

1. Customer Due Diligence and Onboarding

Pave uses a documented onboarding process designed to know its end-user customers and reduce the risk that services will be used to originate illegal traffic. Customer onboarding requires completion and review of Pave compliance and technical documentation, including:

- Know-Your-Customer (KYC) documentation;
- applicable Federal Universal Service Fund (FUSF) documentation;
- Non-Disclosure Agreement (NDA); and
- technical onboarding and service configuration forms.

The onboarding process is used to establish the identity and business relationship of the customer, document the requested service and technical configuration, and provide a record that can be used in connection with compliance reviews, complaints, traceback requests, or suspicious-traffic investigations. Pave may request additional information or documentation where a customer, use pattern, complaint, or network event presents elevated risk.

2. Network Monitoring and Analytics

Pave uses the integrated monitoring and analytics capabilities of its Class 4 switching environment as part of this program. These capabilities are used to review call-detail records, traffic volumes, routing and signaling behavior, unusual calling patterns, repeated or abnormal activity, complaint information, and other network indicators available through the switching platform. The analytics system described in this program is the Class 4 switching platform and its built-in monitoring functionality; Pave does not rely on a separate third-party robocall analytics vendor for the controls described in this program.

When traffic exhibits indicators that may be inconsistent with legitimate use, Pave may investigate the customer and traffic, request supporting information, impose routing or account restrictions, temporarily suspend service, block identified illegal traffic where permitted or required, or terminate service. Any mitigation or blocking action will be implemented consistent with applicable FCC safeguards for emergency communications, including 911 and public-safety calls.

3. Upstream Provider Controls

Pave maintains procedures to know the voice service providers from which it directly receives traffic. As part of network and carrier management, Pave maintains provider and interconnection records and takes reasonable and effective steps designed to avoid directly receiving high volumes of illegal traffic from an upstream provider. Where Pave becomes aware of material compliance concerns involving a directly connected provider, it may investigate, restrict, block, or cease accepting affected traffic as required by applicable FCC rules or orders.

4. STIR/SHAKEN Caller-ID Authentication

Pave certifies that it has fully implemented the STIR/SHAKEN caller-ID authentication framework across its network. Calls originated by Pave are subject to the applicable STIR/SHAKEN requirements and Pave maintains its caller-ID authentication practices in accordance with 47 CFR § 64.6301 and other applicable FCC requirements.

Pave reviews technical and network conditions that could affect authentication and takes corrective action when a material issue is identified. STIR/SHAKEN authentication operates as one component of Pave's broader robocall mitigation program and does not replace customer due diligence, traffic monitoring, complaint review, or traceback cooperation.

5. Traceback and Law-Enforcement Cooperation

Pave commits to respond fully within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, and the registered industry traceback consortium, and to cooperate with those entities in investigating and stopping illegal robocallers that use Pave service to originate calls. Pave will use available customer records, call-detail records, routing information, and network data to support traceback responses and related investigations.

When a traceback or government notice identifies traffic associated with Pave, the matter will be escalated for prompt review. Pave may require customer explanation and documentation, impose controls, suspend service, or terminate service where warranted by the facts and applicable law.

6. Complaints, Remediation, Suspension, and Termination

Pave reviews robocall, spoofing, fraud, traceback, and network-abuse complaints received through its compliance contact or other operational channels. Complaints are evaluated against available customer and network records. Where a violation or material risk is identified, Pave may apply corrective measures proportionate to the circumstances, including warnings, enhanced monitoring, traffic restrictions, temporary suspension, or termination of service. Confirmed illegal activity, repeated non-compliance, refusal to cooperate with a compliance investigation, or material misrepresentation may result in immediate restriction or termination where appropriate.

7. Records and Regulatory Maintenance

Pave maintains records reasonably necessary to administer this program, including customer onboarding documentation, technical forms, relevant call-detail and network records, complaint and investigation records, and traceback response information, subject to applicable legal, privacy, security, and retention requirements. Pave will update its Robocall Mitigation Database filing within the period required by FCC rules when required filing information changes and will complete required annual RMD recertification.

8. Prior Enforcement / Investigation Disclosure

Pave states that, during the two years preceding this certification, neither Pave nor any entity with which Pave shares common ownership, management, directors, or control has been the subject of a formal FCC, law-enforcement, or regulatory-agency action or investigation with accompanying findings of actual or suspected wrongdoing arising from transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or from a deficient Robocall Mitigation Database certification or mitigation-program description.

OFFICER CERTIFICATION

I, Hovig Sam Karakouzian, Chief Executive Officer of Pave VoIP LLC, certify on behalf of Pave VoIP LLC that I am authorized to make this certification and that Pave VoIP LLC maintains the robocall mitigation measures described in this document. Pave VoIP LLC is committed to preventing its services from being used to originate illegal robocall traffic, maintaining full STIR/SHAKEN implementation as stated above, responding to qualifying traceback requests within 24 hours, and cooperating with the Federal Communications Commission, law enforcement, and the registered industry traceback consortium in investigating and stopping illegal robocall activity.

Declaration under 47 CFR § 1.16

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 17, 2026.

Signature	<u>Hovig Sam</u>
Name	Hovig Sam Karakouzian
Title	Chief Executive Officer
Company	Pave VoIP LLC
Date	August 17, 2026

Robocall Compliance Contact

Hovig Sam Karakouzian, CEO | hovig.sam@pavevoip.com | +1 559-626-6350

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