

ROBOCALL MITIGATION PROGRAM

JK Ventures & Consulting GmbH

Gerichtstr. 23, 13347 Berlin, Germany

Filed pursuant to 47 C.F.R. § 64.6305(d)

1. Scope of operations

JK Ventures & Consulting GmbH ("the Company") is a German-registered entity. The Company obtains US telephone numbers as an end-user subscriber of Voxbeam. The service supports inbound and outbound calling by a small, fixed group of named Company personnel who require a US point of contact.

The Company does not offer voice service to any customer, partner, reseller, or member of the public. It does not originate traffic on behalf of any other entity, does not act as a gateway or intermediate provider, and does not carry or transit third-party traffic. It operates no autodialer, predictive dialer, IVR broadcast, or campaign-dialing platform, and exposes no API, SIP trunk, or programmatic interface through which any external party could originate calls. All origination is manual, human-initiated, and attributable to a named individual.

2. STIR/SHAKEN status — § 64.6305(d)(2)(i)

The Company is a foreign entity and has not received and does not rely on any extension under § 64.6304. The Company does not operate the network infrastructure over which its calls are authenticated and therefore lacks the control necessary to implement STIR/SHAKEN itself. Caller ID authentication for calls originated using the Company's US numbers is performed by its upstream provider, Voxbeam, which holds the relevant number assignments and network facilities.

3. Reasonable steps to avoid originating illegal robocall traffic — § 64.6305(d)(2)(ii)

(a) Know-your-customer (§ 64.1200(n)(4)). The Company has no customers. The only persons authorized to originate calls are identified Company personnel operating under written employment or contractor agreements. The Company maintains a current register mapping each assigned US number to a single named individual, their role, and the business purpose of the assignment. No number is shared, pooled, or rotated. Access credentials are issued individually and are not transferable. Because every number resolves to one identified person, the Company can attribute any call originated on its account to a specific individual on request.

(b) Upstream providers. The Company's sole upstream provider is Voxbeam. The Company obtains service under a written agreement, verified Voxbeam's listing in the Robocall Mitigation Database before contracting, and re-verifies that listing at each annual recertification. The Company has no other origination path and does not accept, aggregate, or forward traffic from any upstream source.

(c) Analytics and blocking. The Company operates no network of its own and therefore deploys no independent call-analytics platform. It uses no third-party analytics vendor. Analytics and blocking applicable to the Company's traffic are those performed by Voxbeam under its own mitigation program. In place of network analytics, the Company relies on the following controls, which are proportionate to its call volume: (i) monthly review of call detail records for every assigned number; (ii) volume and

duration thresholds beyond which usage is escalated for internal review; and (iii) immediate suspension of any number showing anomalous origination patterns pending investigation.

(d) Technical and administrative controls. Access to the Voxbeam account is restricted to designated administrators and protected by multi-factor authentication. Credentials are revoked on personnel departure. Caller ID is set only to numbers assigned to the Company; no other number may be presented. Automated and bulk-calling functionality is not provisioned. The Company does not permit resale, sublicensing, or sharing of its numbers.

(e) Response to notice. On receiving credible notice from the Commission, law enforcement, the industry traceback consortium, or Voxbeam that illegal traffic has been originated using its numbers, the Company will suspend the number involved, investigate, terminate the responsible individual's access, and report findings to the notifying party.

(f) Review. The program is reviewed at least annually and on any material change to the Company's telephony arrangements, and filings are updated within ten business days of any change under § 64.6305(d)(5).

4. Traceback commitment — § 64.6305(d)(2)(iii)

The Company commits to respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate fully with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. The individual designated in the Company's RMD filing as responsible for robocall mitigation issues is reachable at the address, telephone number, and email listed there and is authorized to respond to traceback requests on the Company's behalf.

5. Prior actions or investigations — § 64.6305(d)(2)(iv)

At no time in the prior two years has the Company, or any entity sharing common ownership, management, directors, or control with the Company, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing relating to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or relating to a deficient Robocall Mitigation Database certification or mitigation program description.

Jeffrey Katz	Signed by: Jeffrey Katz Date: 2026-08-30 17:13:39 CEST
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Jeffrey Katz
Founder
JK Ventures & Consulting GmbH