

SUMMIT AI TECH LLC

Robocall Mitigation Program Description

Prepared for filing in the Federal Communications Commission Robocall Mitigation Database
Effective: September 18, 2026

Provider	Summit AI Tech LLC
Provider Type	Non-facilities-based interconnected VoIP provider/reseller serving end users
Upstream PSTN Provider	BulkVS
Robocall Mitigation Contact	Pavel Gaponov, President pgaponov@summitaitech.com 916-777-0177

Purpose

Summit AI Tech LLC ("Summit") maintains this Robocall Mitigation Program to significantly reduce the risk that its services are used to originate illegal robocalls or unlawfully spoofed calls. This document describes the specific practices Summit uses for customer vetting, acceptable use, traffic oversight, complaint response, traceback cooperation, enforcement, and management of its upstream voice provider.

1. Service and Network Description

Summit provides interconnected VoIP service to end-user business customers. Summit operates customer-facing VoIP/PBX services and uses BulkVS as its upstream provider for PSTN connectivity, SIP trunking, and telephone numbering resources. Summit does not directly obtain or control NANP numbering resources and does not operate the PSTN facilities through which calls are originated to or terminated from the public switched telephone network.

2. Customer Vetting and Know-Your-Customer Practices

Before activating voice service, Summit takes reasonable steps to identify the customer and understand the intended use of the service. Depending on the customer and circumstances, these steps may include verifying the customer or business name, contact information, service address, billing information, authorized representatives, and the business purpose for the requested voice service. Summit may request additional information when an application, calling use case, requested number volume, or other circumstance presents elevated risk.

Summit does not knowingly activate or maintain service for a customer whose stated or observed use is unlawful robocalling, fraudulent calling, unlawful caller-ID spoofing, impersonation, scams, or other unlawful calling activity. Summit may decline activation where it cannot reasonably verify the customer or intended use.

3. Acceptable Use and Prohibited Calling

Customers may not use Summit service to originate illegal robocalls, transmit fraudulent or misleading caller identification information, impersonate another person or business, facilitate scams, or engage in calling activity that

violates applicable federal or state law. Summit may investigate suspected violations and may restrict, suspend, or terminate service when warranted.

4. Monitoring, Complaints, and Investigation

Summit uses information reasonably available to it to identify potentially abusive calling activity. This may include customer complaints, upstream-provider notices, traceback requests, unusual changes in call volume or calling patterns, repeated short-duration calls, high-volume activity inconsistent with a customer's known business use, and other indicators of suspected illegal traffic.

When suspicious activity is identified, Summit may review account information and available call records, contact the customer for an explanation or supporting information, coordinate with BulkVS or other relevant providers, restrict calling while an investigation is pending, and take corrective action based on the results.

5. Response and Enforcement

If Summit reasonably determines that a customer is using its service to originate illegal robocalls or other unlawful traffic, Summit will take action appropriate to the circumstances. Actions may include warning the customer, restricting specific calling capabilities, blocking or suspending outbound calling, suspending the account, or terminating service. Summit will preserve and provide information as required by lawful process and applicable recordkeeping obligations.

6. Traceback Cooperation

Summit commits to responding fully and within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, and the registered industry traceback consortium, and to cooperating with those entities in investigating and stopping illegal robocallers that use Summit's service to originate calls. Traceback and robocall mitigation inquiries should be directed to the contact identified in this program.

7. Upstream Provider Management

Summit knows the identity of its upstream PSTN provider and maintains a direct commercial relationship with BulkVS. Summit uses BulkVS for PSTN connectivity, SIP trunking, and telephone numbers. Summit will cooperate with BulkVS regarding suspected illegal traffic, traceback requests, fraud or abuse reports, and other robocall mitigation matters. Summit will reassess its upstream relationship if it receives information indicating material robocall-compliance concerns.

8. STIR/SHAKEN Status

Summit does not possess its own STIR/SHAKEN certificate and has not implemented the STIR/SHAKEN authentication framework on any portion of its network. Summit is a non-facilities-based VoIP reseller that lacks control of the network infrastructure necessary to implement STIR/SHAKEN for the calls described in this program. BulkVS provides the upstream PSTN connectivity and performs STIR/SHAKEN authentication for outbound PSTN traffic. Summit therefore reports its implementation status consistently with the exemption applicable to providers that lack the facilities necessary to implement STIR/SHAKEN. Summit will reevaluate this status if its network architecture or regulatory obligations change.

9. Program Administration and Review

The President of Summit AI Tech LLC is responsible for administration of this program. Summit will review its practices periodically and when material changes occur in its service architecture, customer base, upstream providers, or applicable regulatory requirements. Summit will update its Robocall Mitigation Database filing when required and will ensure that the practices described in this document reflect the measures it actually follows.

Robocall Mitigation Contact

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Certification note: This program description should be filed only if it accurately describes Summit AI Tech LLC's actual practices. The company should revise the document and its RMD filing if those practices or its network configuration materially change.