

Robocall Mitigation Plan

Centurion CARES, Inc.
Effective Date: 01/01/2026
Version: 1.0

1. Purpose

Centurion CARES maintains a robocall mitigation program designed to identify and mitigate potentially illegal or abusive robocall traffic originating from or transiting our voice services.

Our program focuses on maintaining appropriate call traffic records, investigating reported or suspected abuse, responding to identified incidents, and cooperating with our voice service providers and regulatory authorities.

2. Call Traffic Logging

Centurion CARES maintains call traffic records sufficient to support investigation of voice traffic and identification of the customer and telephone numbers associated with calls.

These records may include calling and called telephone numbers, call date and time, call duration, customer/account information, and other information necessary to investigate reported or suspected abusive calling activity.

3. Investigation and Mitigation

When potentially illegal or abusive robocall activity is identified or reported, Centurion CARES investigates the affected traffic using available call and system records.

Depending on the circumstances, mitigation may include:

- Identifying the source of the traffic;
- Reviewing relevant calling activity;
- Contacting the customer or responsible party;
- Restricting or suspending affected calling activity;
- Blocking identified abusive traffic or telephone numbers; and
- Terminating or otherwise restricting service when warranted.

4. Carrier and Industry Notifications

Centurion CARES reviews robocall-related notifications received from its voice service providers, carriers, customers, or other industry participants.

Reports identifying specific calling activity are investigated using available records, and appropriate mitigation measures are taken when warranted.

5. Traceback Cooperation

Centurion CARES maintains the operational capability to investigate the source of calls using available customer, telephone-number, and call-detail information.

We will cooperate with the FCC, law enforcement, the Industry Traceback Consortium, and our voice service providers in investigations of suspected illegal robocall activity.

Centurion CARES commits to respond fully and within **24 hours** to traceback requests from the FCC, law enforcement, and the Industry Traceback Consortium, consistent with applicable FCC requirements.

6. Caller ID and STIR/SHAKEN

Centurion CARES works with its voice service provider(s) to support applicable caller-ID authentication and STIR/SHAKEN requirements.

We provide the information necessary for our carrier to apply appropriate caller-ID authentication to traffic originated through our services and investigate reports of suspected caller-ID spoofing or misuse.

7. Recordkeeping

Centurion CARES retains relevant operational records needed to investigate suspected robocall activity and respond to traceback requests.

8. Program Review

Centurion CARES periodically reviews its robocall mitigation procedures and updates them as necessary based on changes to its voice services, identified abuse patterns, carrier requirements, and applicable FCC requirements.

Robocall Mitigation Contact:

Paul Wysocki, EVP/CTO
pwyssocki@centurioncares.com
+1-262-317-5621