

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Crestline Ventures LLC

NON-CONFIDENTIAL / REDACTED VERSION

Prepared for review and potential submission to the FCC Robocall Mitigation Database.

Important Filing Note

This document is a compliance draft prepared for Crestline Ventures LLC. Before filing, the company must verify that every described practice accurately reflects its current network, customer onboarding, traffic monitoring, caller-ID authentication, blocking, traceback, and incident-response procedures. The FCC requires a description of specific reasonable steps used to mitigate illegal robocalls; a generic statement that a mitigation program exists is not sufficient.

1. Company Information

Legal Name	Crestline Ventures LLC
Document Type	Robocall Mitigation Program Description
Effective / Review Date	September 24, 2026
FCC FRN	[TO BE COMPLETED]
FCC OCN (if applicable)	[TO BE COMPLETED / N/A]
Primary Business Address	[TO BE COMPLETED]
Robocall Mitigation Contact	[NAME / TITLE / PHONE / EMAIL — TO BE COMPLETED]

2. Program Scope and Objective

Crestline Ventures LLC maintains a robocall mitigation program intended to reduce the origination, carrying, and processing of illegal robocalls and unlawful caller-ID spoofing associated with traffic handled through the company's voice services. The program is designed around traffic screening, customer and traffic validation, caller-ID controls, monitoring, blocking or suspension of suspicious traffic, traceback cooperation, and documented incident response.

3. Customer and Traffic Vetting

- Obtain and maintain customer/business identification and contact information appropriate to the service being provided.
- Review customer use cases and expected calling patterns before enabling voice traffic, where applicable.
- Apply additional review to traffic that materially deviates from an established customer profile or expected calling behavior.
- Investigate indications that a customer may be originating unlawful robocalls, spoofed caller ID, or other prohibited traffic.
- Restrict, suspend, or terminate traffic or accounts when the company determines that continued service presents a material robocall-mitigation or compliance risk, consistent with applicable agreements and law.

4. Caller-ID and STIR/SHAKEN Controls

Crestline Ventures LLC will apply caller-ID validation and authentication controls appropriate to the portions of its network and call paths for which it has the technical and regulatory responsibility to do so. The company's FCC filing should separately identify its actual STIR/SHAKEN implementation status (fully implemented, partially implemented, or not implemented) and any applicable extension or exemption.

Implementation status for filing: [TO BE CONFIRMED]

If STIR/SHAKEN is implemented, insert the actual signing, verification, attestation, and certificate-management practices used by the company. If another provider performs these functions, identify the relevant relationship and call-path responsibility.

5. Traffic Monitoring and Detection

- Monitor traffic for abnormal patterns that may indicate robocalling, spoofing, high-volume unwanted calls, or compromised customer accounts.
- Use available call-detail, signaling, reputation, complaint, or analytics information to identify suspicious traffic.
- Review unusual increases in call volume, short-duration call patterns, repeated destination attempts, anomalous caller-ID use, or other indicators relevant to the company's traffic.
- Escalate suspicious activity for investigation and document material findings and actions taken.

6. Blocking, Suspension, and Remediation

When investigation identifies traffic reasonably believed to be illegal or materially inconsistent with the customer's authorized use, Crestline Ventures LLC may take proportionate corrective action, which may include blocking specific traffic, restricting destinations or calling privileges, requiring customer remediation, suspending service, or terminating the account. Actions should be documented sufficiently to support later compliance review and traceback response.

7. Traceback Cooperation

Crestline Ventures LLC commits to responding within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and to cooperate with appropriate entities in investigating and stopping illegal robocalls. The company will maintain appropriate records needed to identify relevant customers, call paths, traffic, and service activity to the extent available and permitted by applicable law.

8. Recordkeeping and Compliance Review

The company will retain appropriate records relating to material robocall investigations, customer actions, blocking or suspension decisions, traceback requests, and mitigation incidents in accordance with its applicable retention policies and legal obligations. The program should be reviewed periodically and updated when network architecture, service offerings, applicable FCC requirements, or observed abuse patterns materially change.

9. Employee and Operational Awareness

Personnel responsible for customer onboarding, network operations, fraud/compliance monitoring, and voice traffic management should be informed of the company's robocall mitigation procedures and escalation process. Material incidents should be escalated to the designated robocall mitigation contact.

10. Program Governance

Crestline Ventures LLC designates an internal responsible contact for robocall mitigation matters. That individual is responsible for coordinating traceback responses, internal investigations, mitigation actions, and updates to the company's FCC filing when required.

11. Information to Complete Before FCC Submission

Item	Status
FCC FRN	TO BE COMPLETED
Business address	TO BE COMPLETED
Robocall mitigation contact (name/title/phone/email)	TO BE COMPLETED
Actual provider role(s) in call path	TO BE COMPLETED
Actual STIR/SHAKEN implementation status	TO BE COMPLETED
Applicable STIR/SHAKEN extension/exemption, if any	TO BE COMPLETED / N/A
Principals / affiliates / subsidiaries / parent companies	TO BE COMPLETED
Recent qualifying enforcement actions/investigations	TO BE COMPLETED / NONE — VERIFY
OCN, if applicable	TO BE COMPLETED / N/A
Specific systems/tools used for monitoring and mitigation	TO BE COMPLETED

Regulatory Reference

Prepared with reference to the FCC Robocall Mitigation Database filing requirements, including 47 CFR § 64.6305 and the FCC's Robocall Mitigation Database Filing Instructions. Official FCC filing instructions: <https://www.fcc.gov/sites/default/files/rmd-instructions.pdf>

Drafting note: This document is not an FCC certification and does not by itself establish that Crestline Ventures LLC satisfies any particular regulatory requirement. The company should verify the factual accuracy of this program description and the associated FCC database certification before submission.