

DESIGNKETCHERS LLC

Robocall Mitigation Program Description

Prepared for submission to the FCC Robocall Mitigation Database (RMD)

NON-CONFIDENTIAL — REDACTED VERSION

Legal Business Name	Designketchers LLC
EIN	93-2843077
FCC Registration Number (FRN)	0038958773
Business Address	601 Eagle Hollow Ln, League City, TX 77573
Responsible Person	Scott Thomas Hymel
Purpose	Robocall Mitigation Database filing
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1. Purpose and Scope

Designketchers LLC maintains a risk-based robocall mitigation program intended to reduce the origination, carrying, and processing of illegal robocalls and unlawful caller-ID spoofing, to the extent applicable to the company's role in the call path.

The program applies controls across customer onboarding, traffic activation, ongoing traffic monitoring, complaint handling, traceback response, and suspension or termination of traffic when appropriate.

The controls described below are intended to operate consistently with applicable FCC requirements and other applicable federal, state, contractual, and industry obligations.

2. Customer and Traffic Onboarding Controls

- Customer identification and business-purpose review are performed before traffic is permitted, with supporting documentation maintained as appropriate for the relationship.
- Designketchers LLC evaluates intended traffic type, calling campaigns, expected calling patterns, telephone-number use, and other available information to identify elevated-risk traffic.
- Customers are expected to provide accurate business and contact information and to cooperate with compliance inquiries and traceback investigations.
- Traffic may be restricted, suspended, or terminated where available information indicates unlawful calling, material policy violations, misleading caller-ID practices, or failure to address identified compliance concerns.

3. Measures to Prevent Illegal Robocalls by New and Renewing Customers

Designketchers LLC uses customer and traffic due diligence as an affirmative risk-control measure. Before activation and during the customer relationship, available business, contact, traffic-purpose, caller-ID, and compliance information may be reviewed to identify elevated-risk customers or campaigns.

Where risk indicators or compliance concerns are identified, the company may require additional information or corrective action and may restrict, suspend, or terminate traffic as appropriate.

- Customer/business identity and purpose review before traffic activation.
- Review of intended calling campaigns and traffic characteristics.
- Compliance cooperation requirements for customers.
- Escalation, restriction, suspension, enhanced monitoring, or termination where warranted.

4. Traffic Monitoring and Detection

- Designketchers LLC monitors traffic for abnormal or high-risk calling patterns using available network and call-detail information.
- Monitoring may consider call volume, answer behavior, duration patterns, caller-ID behavior, complaint information, traceback activity, and other indicators associated with potentially unlawful or abusive traffic.
- Traffic presenting elevated risk may be subjected to additional review, increased monitoring, routing restrictions, or other mitigation measures.
- Designketchers LLC maintains records and supporting information necessary to investigate identified incidents and respond to appropriate requests from regulators, law enforcement, traceback organizations, and industry partners.

5. Call Analytics Systems

Designketchers LLC uses available network and call-detail information as part of its traffic monitoring and risk-detection process. Call analytics and traffic-analysis capabilities are used to identify abnormal, elevated-risk, or potentially unlawful calling patterns and to support investigation and mitigation.

6. Caller-ID Authentication and Spoofing Controls

Where applicable to the portions of Designketchers LLC's network and traffic under its control, Designketchers LLC supports caller-ID authentication and validation practices consistent with applicable STIR/SHAKEN requirements.

Designketchers LLC uses reasonable controls to identify and address suspicious or unauthorized caller-ID use and may request supporting information when caller-ID ownership or use is questioned.

7. Know-Your-Upstream-Provider Procedures

Designketchers LLC maintains a risk-based approach to understanding the parties from which traffic is received and the relationships relevant to the call path, to the extent applicable to its role.

Upstream relationships are reviewed using available business, contact, traffic, routing, compliance, and operational information. Information relevant to the source and handling of traffic is maintained as appropriate for compliance review and traceback response.

8. Complaint, Traceback, and Incident Response

- Designketchers LLC investigates credible reports of illegal robocalls, spoofing, spam, or other unlawful traffic.
- When a traceback request is received from the FCC, law enforcement, or the industry traceback consortium, Designketchers LLC will cooperate with the investigation and respond fully within the applicable 24-hour period required by FCC rules.
- Designketchers LLC uses available call records, customer records, routing information, and related technical data to identify the source and relevant downstream or upstream parties involved in an incident.
- Where an investigation identifies traffic that violates applicable requirements, Designketchers LLC may block or suspend traffic, require corrective action, place the customer under enhanced monitoring, or terminate the relationship, as appropriate.
- Designketchers LLC will cooperate with reasonable requests for information needed to investigate and stop illegal robocall activity, subject to applicable law and confidentiality requirements.

9. Blocking and Remediation

- Designketchers LLC may block numbers, routes, campaigns, customers, or traffic patterns associated with confirmed or materially suspected unlawful activity.
- Mitigation actions may include traffic suspension, route restriction, caller-ID restrictions, customer remediation requirements, enhanced verification, enhanced monitoring, and termination of service.
- Previously identified abusive traffic patterns are reviewed when appropriate so that materially similar traffic can be detected and addressed.

10. Recordkeeping and Compliance Oversight

- Designketchers LLC maintains appropriate records relating to customer onboarding, traffic investigations, complaints, traceback requests, mitigation actions, and material compliance incidents.
- Records are retained and handled in accordance with applicable legal, contractual, and internal requirements.
- Compliance personnel or designated management review significant incidents and remediation actions.

11. Program Governance and Continuous Improvement

Designketchers LLC periodically reviews its robocall mitigation controls in light of traceback activity, complaints, observed traffic patterns, regulatory developments, and changes in network or customer risk.

Where weaknesses or new abuse patterns are identified, Designketchers LLC may revise monitoring, verification, blocking, escalation, or customer-management procedures.

12. Program Commitment

Designketchers LLC is committed to taking reasonable steps to significantly reduce illegal robocall activity associated with traffic that it originates, carries, or processes, as applicable to its role in the call path.

Designketchers LLC will cooperate with the FCC, law enforcement, and the industry traceback consortium in investigating and stopping illegal robocallers and will respond to applicable traceback requests within the required timeframe.

13. Public Disclosure and Redactions

The non-confidential version intentionally omits security-sensitive implementation details, internal monitoring thresholds, technical identifiers, customer-specific information, vendor-specific configurations, and other information that is not necessary for the public to understand the nature of Designketchers LLC's robocall mitigation program.

14. Certification

Designketchers LLC maintains this robocall mitigation program to reduce illegal robocall traffic and unlawful caller-ID spoofing and to support compliance with applicable FCC requirements.

Designketchers LLC commits to cooperate with the FCC, law enforcement, and the industry traceback consortium in investigating and stopping illegal robocall activity and to respond fully to applicable traceback requests within 24 hours.

Scott Thomas Hymel