

Robocall Mitigation Plan

Red Flannel Solutions LLC

FRN: 0038905717 | Form 499 Filer ID: 839325 | OCN: None

Effective date: 10/06/2026

1. Company and Service Description

Red Flannel Solutions LLC is a voice service provider. It resells hosted PBX/UCaaS voice services built on the SkySwitch platform to business customers in the United States. Red Flannel Solutions LLC does not operate as a gateway provider or a non-gateway intermediate provider, and it does not accept voice traffic from other providers for termination or transit. All outbound calls from Red Flannel Solutions LLC customers originate on the SkySwitch platform and reach the PSTN through SkySwitch and its underlying carriers.

Upstream provider: SkySwitch:

PayG, LLC dba Skyswitch **RMD0002940**

CTICLOUD Hosting Inc. **RMD0039104.**

2. STIR/SHAKEN Implementation Status

Red Flannel Solutions LLC certifies No STIR/SHAKEN Implementation. Red Flannel Solutions LLC does not currently hold an OCN or SPC token and therefore does not sign calls with its own certificate. Outbound SIP calls originated by Red Flannel Solutions LLC customers are authenticated by SkySwitch on its platform. Red Flannel Solutions LLC relies on the robocall mitigation program described below.

3. Reasonable Steps to Avoid Originating Illegal Robocalls

These measures implement § 64.6305(a) and the § 64.1200(n)(3) obligation to know our customers and prevent new and renewing customers from originating illegal calls.

3.1 Know Your Customer. Service is sold only to business customers. Before activation, Red Flannel Solutions LLC verifies:

the customer's legal business name and physical address;

the customer's EIN or state business registration;

an authorized contact's name, phone, and email; and

the intended use of the service.

Red Flannel Solutions LLC does not knowingly provision service for autodialed, prerecorded, or high-volume outbound calling campaigns. Any such use requires prior written approval, which is given only after the customer provides evidence of legal compliance. Existing customers are re-reviewed at renewal or when their usage profile changes materially.

3.2 Acceptable Use Terms. Customer agreements prohibit illegal robocalls, caller ID spoofing, and violations of the TCPA, the Truth in Caller ID Act, and FCC rules. The agreements allow Red Flannel Solutions LLC to suspend or terminate service immediately for violations and require customers to cooperate with investigations.

3.3 Caller ID Controls. Outbound caller ID is limited to telephone numbers assigned to the customer on Red Flannel Solutions account, or numbers the customer shows it has the right to use, such as through a letter of authorization. Red Flannel Solutions LLC does not permit arbitrary caller ID. Consistent with § 64.1200(k) and (o), Red Flannel Solution, LLC, directly or through its upstream provider, blocks calls that present invalid, unallocated, unassigned, or Do-Not-Originate numbers as caller ID.

3.4 Usage Limits and Monitoring.

Each account's concurrent call limits are sized to its purchased seats and trunks.

International calling is disabled by default and enabled only on request.

Red Flannel Solutions LLC reviews call detail records routinely and investigates any platform or upstream alerts. It looks for indicators of robocalling, such as unusual call volumes, high rates of short-duration calls, low answer rates, or large numbers of unique destinations.

3.5 Response to Suspected Illegal Traffic. When Red Flannel Solutions LLC identifies or is notified of suspected illegal robocall traffic, it investigates promptly. If illegal calling is confirmed or reasonably suspected, Red Flannel Solutions LLC suspends the traffic or the account, and it terminates customers who do not remedy the problem.

3.6 Complaints. Reports of suspected illegal calls can be sent to cliff.haas@redflannel.ai or (201) 925-0752, and Red Flannel Solutions LLC reviews them promptly.

4. Traceback and Cooperation Commitment

Red Flannel Solutions LLC commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group. It also commits to cooperate with these entities in investigating and stopping any illegal robocallers that use its service to originate calls. The designated traceback contact is Clifford Haas, Principal
cliff.haas@redflannel.ai
(201) 925-0752

5. Commission Notifications

Red Flannel Solutions LLC will comply with any Enforcement Bureau notification under § 64.1200(n). This includes investigating identified traffic, blocking or ceasing to originate it as directed, and reporting results within the required timeframes.

6. Prior Enforcement Disclosure

In the prior two years, neither Red Flannel Solutions LLC nor any entity sharing common ownership, management, directors, or control with it has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing related to illegal robocalls, spoofing, or a deficient RMD certification.

7. Program Maintenance

Red Flannel Solutions LLC reviews this program at least annually. It will update its RMD filing when the information changes, within the timeframe required by Commission rules, and will recertify annually on or before March 1.

8. Officer Certification

I certify under penalty of perjury that the foregoing is true and correct, pursuant to 47 CFR § 1.16.

Name: Clifford Haas

Title: Principal

10/06/2026