TECHNOLOGY CATAPULT Robocall Mitigation Plan

FCC Compliance Filing Pursuant to 47 C.F.R. § 64.6305

I. Certification Statement

TECHNOLOGY CATAPULT hereby certifies to the Federal Communications Commission (FCC) the following:

1. We have fully implemented and maintain a robocall mitigation program that complies with all requirements set forth in 47 C.F.R. § 64.6305. This program applies to all voice traffic originating from, terminating on, or transiting our network.
2. **Disclosure of Prior Actions:** Pursuant to 47 C.F.R. § 64.6305(d)(2)(iv), we state the following: **Neither TECHNOLOGY CATAPULT nor any entity under common ownership, management, directors, or control has been the subject of any formal FCC, law enforcement, or regulatory agency action or investigation in the prior two years involving findings of actual or suspected wrongdoing related to illegal robocalls, spoofing, or a deficient Robocall Mitigation Database filing.**
3. **STIR/SHAKEN Status:** TECHNOLOGY CATAPULT **does not claim** the small voice service provider exemption under § 64.6304(a), as that exemption expired on June 30, 2023. We are actively taking reasonable steps to implement STIR/SHAKEN and file this mitigation program as required.

II. STIR/SHAKEN Status & Caller ID Authentication

a. Implementation Status:
Partial Implementation: TECHNOLOGY CATAPULT has implemented STIR/SHAKEN on a portion of its network.

b. Alternative Robocall Mitigation:
During any period of partial implementation, we maintain the documented robocall mitigation program detailed herein to prevent illegal robocall traffic from originating, transiting, or terminating on our network.

c. Caller ID Validation & Spoofing Prevention:
We enforce strict policies requiring all subscribers to use only telephone numbers assigned by TECHNOLOGY CATAPULT or explicitly authorized in writing.

III. Know Your Customer (KYC) & Customer Due Diligence

a. Subscriber Verification:
Prior to onboarding, we perform identity verification and collect a legitimate physical service address for all new residential, retail, and wholesale subscribers.

b. Enhanced Due Diligence for High-Risk Customers:
Customers identified as higher risk (e.g., outbound call centers, high-volume originators, resellers) undergo enhanced application review, including business validation, and are subject to ongoing, real-time monitoring for anomalous calling patterns.

c. Upstream Provider Vetting (Know Your Upstream Provider):
Pursuant to **47 C.F.R. § 64.1200(n)(5)**, we comply with our obligation to know our upstream providers. Our process includes:

1. Verifying the provider's active, non-de-listed registration in the FCC Robocall Mitigation Database prior to enabling traffic exchange;
2. Collecting and verifying basic business information (legal name, physical address, contact information, and OCN where applicable);
3. Retaining records of this verification.

IV. Network Monitoring & Illegal Traffic Mitigation

a. Real-Time Traffic Analysis:
We employ automated systems to monitor outbound and inbound call traffic in real time for patterns indicative of illegal robocalling, including: excessive call volume spikes, abnormally short call durations, high call blocking or answer seizure ratios, and consumer complaint trends.

b. Mitigation Actions:
Upon detection of suspicious activity, we initiate immediate investigation. Confirmed illegal robocall traffic results in prompt action, including suspension or termination of the offending subscriber or carrier account, blocking of traffic from non-compliant upstream providers, and notification to law enforcement or the FCC as appropriate.

V. Traceback Cooperation & 24-Hour Response Commitment

a. Designated 24/7 Point of Contact:
TECHNOLOGY CATAPULT maintains a dedicated 24/7 point of contact for traceback requests.

b. Mandatory 24-Hour Response to Tracebacks:
TECHNOLOGY CATAPULT commits to fully responding to all traceback requests from the FCC, law enforcement, and the registered traceback consortium **within 24 hours of receipt**. A complete response includes identification of the originating subscriber or upstream provider, call detail records sufficient to trace the traffic, and confirmation of any mitigation actions taken.

c. Full Cooperation:
We will cooperate fully in all traceback investigations, including preserving evidence and providing authenticated call data.

VI. Contractual Enforcement & Penalties

All subscriber, reseller, and carrier agreements contain legally enforceable provisions that:

- Explicitly prohibit illegal robocalls and caller ID spoofing;
- Require full cooperation with traceback investigations (including 24-hour response);
- Grant TECHNOLOGY CATAPULT the right to immediately suspend or terminate service for violations;
- Impose financial penalties or service-level remedies for repeat or willful violations.

VII. Ongoing Compliance & Plan Review

TECHNOLOGY CATAPULT will:

- Review and update this plan at least annually or promptly following material changes;
- Conduct internal audits of KYC, monitoring, and traceback response processes;
- Train relevant personnel on traceback handling and 24-hour response obligations;
- Maintain compliance with the TRACED Act and all evolving FCC regulations.