

Robocall Mitigation Plan for Fortel Networks, Inc.
Updated as of February 27, 2026

Business Information

Fortel Networks, Inc.

Address: 9183 Survey Rd, Elk Grove, CA 95624

Contact: Peter Priest

Phone: 916-580-1900

Email: p.priest@fortel.us

Overview Fortel Networks, Inc. ("Fortel") is a small retail voice service provider specializing in hosted IP PBX telephone systems and services for business customers. Fortel serves end-users with customized telephony solutions and does not sell wholesale minutes, provide SIP trunking for resale, act as an intermediate provider, or originate/terminate traffic for other carriers. Fortel does not accept foreign-originated traffic and operates solely with domestic U.S. NANP resources for retail end-user customers.

As a small provider without its own Class 4 switch or least-cost routing platform, Fortel relies on trusted underlying carriers for DID origination, call termination, and STIR/SHAKEN attestation/signing.

This updated Robocall Mitigation Plan complies with FCC regulations under 47 CFR § 64.6305 and the 2025 Robocall Mitigation Database Report and Order (effective February 5, 2026, with first annual recertification due March 1, 2026). Fortel's retail-only model and focus on legitimate business communications result in inherently low robocall risk.

Certifications Fortel Networks, Inc. hereby certifies that:

1. It partially implements STIR/SHAKEN on the IP portions of its network by utilizing underlying carriers to sign calls with proper attestation based on verified customer DIDs used as caller ID (ANI).
2. No prior certification has been removed by Commission action.
3. Fortel has not been prohibited from filing in the Robocall Mitigation Database.
4. Fortel commits to respond fully to all traceback requests within 24 hours from the FCC, law enforcement, and the Industry Traceback Group (ITG).
5. Neither Fortel nor any affiliated entity has been subject to any Commission or law enforcement agency action or investigation in the prior two years due to suspected involvement with illegal robocalling or spoofing, or due to a deficiency in its RMD certification.

Company Structure and Relationships

1. Fortel Networks, Inc. is an independent company with no parent company, subsidiaries, or affiliates.
2. Fortel operates as a retail carrier serving end-user businesses and does not sell wholesale minutes or act as an intermediate/gateway provider.
3. Principal Information:
 - Peter Priest, President and Director
 - No other principals or directors

Role in Call Chain Fortel serves as a voice service provider (VSP) with STIR/SHAKEN implementation obligations, serving retail end-users only.

Call Analytics and Traffic Monitoring

1. Internal Analytics:

- Monitor traffic patterns on a per-customer and per-ANI basis.
- Track call duration distributions and short-duration call patterns.
- Analyze anomalous calling patterns (e.g., unusual volume spikes).

2. Third-Party Analytics:

- Utilize underlying carrier analytics systems for real-time monitoring of ASR, ACD, call velocity, snowshoeing, and other suspicious indicators.
- Leverage carrier-provided blocking lists, reputation databases, and high-risk alerts (reviewed within 4 hours). Independent advanced analytics are unnecessary and disproportionate for a small retail provider with predictable, low-volume business traffic.

Know Your Customer (KYC) Procedures Customer Verification

- Initial Screening: Require complete questionnaire; verify business name, address, nature of business, and legitimacy; screen for autodialing/telemarketing intentions.
- Validate customer identity and right-to-use for presented DIDs.

Upstream Provider Verification

- Prior to contracting and annually thereafter: Collect business information, verify federal tax ID (where available), confirm active RMD filing and STIR/SHAKEN status via the RMD portal, and document role in call chain.

Mitigation Measures Prevention

- Telephone Number Authorization: Verify authority to use numbers; track assignments; validate Caller ID against customer inventory; require authentication for origination.
- Traffic Monitoring: Monitor for suspicious patterns, short-duration calls, duration distribution, and unusual volumes; enforce FCC Do-Not-Originate (DNO) list blocking via upstream carriers.

Investigation and Response

- Suspicious Activity Protocol: 24/7 monitoring and alert system; immediate investigation of alerts; documented incident response; require customer cooperation.
- Enforcement Actions: Service suspension, account termination, IP blocking if necessary, and cooperation with law enforcement.

Contractual Controls

1. Acceptable Use Policy (AUP): Prohibits impersonation, fraudulent activity; requires legal/TCPA compliance; enables suspension/termination.
2. Terms of Service (TOS): Mandates cooperation with investigations, response to illegal call allegations, call monitoring authorization, and remediation documentation.

Compliance with FCC Requirements Fortel fully complies with FCC robocall mitigation rules:

- Maintains an active filing in the Robocall Mitigation Database (RMD), detailing role, STIR/SHAKEN status, and mitigation plan.
- **Annual Recertification:** Will recertify RMD filing annually by March 1
- **Prompt Updates:** Update RMD and CORES registration within 10 business days of any material change (e.g., ownership, contacts), per 47 CFR § 64.6305.
- Responds fully to ITG traceback requests within 24 hours.
- Pays any required filing fees when effective

- Responds promptly to FCC deficiency notices, curing issues within specified timeframes to avoid RMD removal or traffic blocking.
- Noncompliance risks include base forfeitures (\$10,000 for false/inaccurate info; \$1,000 per day until cured for late updates). Fortel does not possess an Operating Company Number (OCN), as it is a small retail provider without local exchange carrier status. Per FCC guidance, no OCN is required, and "No" is selected on the RMD form.

Plan Maintenance

- Regular review and updates to address new threats and regulatory changes.
- Monitor industry developments, provide staff training, and document changes.
- Material updates filed in the RMD within 10 business days.

This plan will be updated as needed. Material changes will be filed with the FCC Robocall Mitigation Database within ten (10) business days.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct.

Peter Priest President Fortel Networks, Inc.

Authorized By: Fortel Networks, Inc. Compliance Team

Contact: Peter Priest, President

Program Review Cycle: Annual or as required by FCC rule changes