



Computer Telephony Innovations DBA Voxtelesys **RoboCall Migration Plan**

Computer Telephony Innovations DBA Voxtelesys is an interconnected VoIP provider offering voice, messaging, fax, API, and hosted PBX services to our end users.

1. Stir/Shaken

Computer Telephony Innovations DBA Voxtelesys has complete/full STIR/SHAKEN integration into our IP/Voice Network, we are signing all calls that originate from our network based on A, B, or C attestation.

2. Traceback Group

Computer Telephony Innovations DBA Voxtelesys is a member of the ITG and responds within 24 business hours to any complaint or traceback.

3. KYC (Know Your Customer)

Computer Telephony Innovations DBA Voxtelesys has a strict KYC process in place, every customer is vetted before their account is enabled for outbound calling, messaging, or faxing. Free email domains are automatically blocked from self-sign-on and require extra vetting such as ID verification and KYB verification.

4. KYB (Know Your Business)

Computer Telephony Innovations DBA Voxtelesys has implemented a KYB vetting process, we use a third party service to check EIN, Address, and other business details the customer submits for accuracy.

5. DNO (no not originate)/Caller ID Check

Computer Telephony Innovations DBA Voxtelesys uses the DNO list for the ITG as well as maintains its own internal DNO list of known high-risk or fraud caller IDs. We perform daily cross-references of network traffic against ITG and internal DNO lists. Any suspicious activity is manually flagged for immediate review and mitigation by our compliance team.

6. Account Limitations

Computer Telephony Innovations DBA Voxtelesys has restrictions in place on all accounts that reduce the risk of high-volume robocalling. All accounts have blocked outbound calling, messaging, and faxing until it has passed KYC, accounts have a call per second limitation, a max concurrent call limitation, and an account spend limitation, all these will limit exposure to mass/large amounts of calls as well as disable the account and notify our compliance department of the suspected fraud.



7. Acceptable Use Policy and Master Service Agreement

All customers must adhere to our Acceptable Use Policy (AUP) and Master Service Agreement (MSA), which strictly prohibit illegal activities, fraud, and unauthorized robocalling.

CTI/Voxtelesys reserves the right to terminate service for any user found to be in violation.

AUP: <https://voztelesys.com/document/acceptable-use-policy>

MSA: <https://voztelesys.com/document/master-service-agreement>

Certification:

I, Kevin Burke, certify that I have examined the foregoing Robocall Mitigation Plan, and that the information contained herein is true and correct to the best of my knowledge.

Signed: *Kevin Burke*

Title: COO

Date: February 23, 2026