

Robocall Mitigation Plan

Business Information

PBXIO LLC
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Contact Information

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Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (2023) ("R&O"), it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

PBXIO LLC ("PBXIO") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network.

As certified in the FCC's Robocall Mitigation Database, PBXIO has fully implemented STIR/SHAKEN. In compliance with the R&O, PBXIO submits this RMP and certification.

Know Your Customer ("KYC")

PBXIO uses ClearIP, a TransNexus software product to identify and control fraud. See <https://transnexus.com/clearip/>

PBXIO also has a strong KYC process. New PBXIO subscribers must provide name, telephone number, email address, and country. Subscribers to the PBXIO platform ("platform"), are sold in person from and confirm to be a real company before going live. New subscribers have their outbound calls rate-limited to one per second, and human contact via phone call or in-person is required in order to

increase that rate. All subscribers placing outbound calls can only use Caller IDs which have been purchased through our platform.

Pay-by-invoice is allowed only for subscribers who we know well, with human contact via phone call or in-person at the very least, and credit and associated checks having taken place.

Human contact via phone call or in-person is required in order for new subscribers to gain access to the PBXIO platform to make outbound calls. A subscriber must provide payment through one of the following methods:

1. by phone, calling our local or toll-free number.
2. by check via mail.
3. online via our payment site.
4. through autopay by filling out our ACH form and providing the required information.

PBXIO is a small company, and we have a small number of customers. As a result, We know our customers and understand their use cases.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls*, and *Call Authentication Trust Anchor*, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, 38 FCC Rcd 5404 (2023), at ¶¶ 49-51, PBXIO provides the following information concerning its upstream voice service carrier.

PBXIO has two upstream providers from which it receives voice traffic:

- 1) Inteliquent (Sinch)
One Alliance Center
3500 Lenox Road NE, Suite #1875
Atlanta, GA 30326
support@sinch.com
- 2) Bandwidth
2230 Bandmate Way
Raleigh, NC 27607
ticketing@bandwidth.com

PBXIO has master service agreements with its upstream providers and has received assurances in writing from their officials that they have, and will continue to, sign calls transmitted to PBXIO and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to PBXIO. PBXIO and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

PBXIO maintains an AUP that subscribers must agree to before being permitted to use PBXIO's software and services. Among other things, the AUP prohibits:

- using our service for any illegal purposes whatsoever;

- engaging in activity for which FCC or any equivalent national regulatory authority, has restricted or regulated in relation to proper use of the public telephony network or the Internet;
- using our service if PBXIO determines, in its sole discretion, that provision for a customer is prohibited by applicable law or is impractical or unfeasible for any legal or regulatory reason; and
- using our service to offer, or otherwise make available to others, fraudulent goods, services, schemes, or promotions, including make-money-fast schemes, Ponzi and pyramid schemes, phishing, pharming, harvesting or similar deceptive practices.

Telephone Number Authorization

New subscribers placing outbound calls can only use Caller IDs which have been purchased through upstream VoIP providers (Sinch and Bandwidth).

Analytics for Monitoring Traffic

PBXIO works to detect a calling pattern consistent with illegal robocalls. If such a call is detected, we will identify the party who is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

A third-party vendor, TransNexus, is used to prevent fraud and unwanted robocalls.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, PBXIO's risk prevention team is alerted, which follows the defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

PBXIO follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, PBXIO will devote sufficient resources to provide prompt and complete resources to traceback requests. PBXIO commits to responding to traceback requests fully within 24 hours.

Blocking

PBXIO will promptly respond to Do Not Originate requests it receives from ITG. PBXIO has mechanisms to automatically block suspicious calls using internal analytics. If PBXIO's monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, PBXIO will take appropriate action which may include suspending or terminating the subscriber's use of PBXIO's network. PBXIO will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), to the FCC, and/or ITG; as well as documenting requests and actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to response to the dynamic nature of mitigating illegal robocalling. PBXIO will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, PBXIO will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of David Burr

I, David Burr, President of PBXIO LLC, do hereby certify, under penalty of perjury, the following:

- (1) PBXIO has fully implemented STIR/SHAKEN in the IP portions of its network.
- (1) PBXIO's Business name and primary address are as follows:

PBXIO LLC
505 w 2600 s
Bountiful UT 84014
- (2) PBXIO has no other business names in use.
- (3) PBXIO has not previously used any other business name.
- (4) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (5) The following persons/entities own more than 10% of PBXIO each: David Burr.
- (6) The following persons exercise management and control over PBXIO: David Burr.
- (7) PBXIO has the following subsidiaries/affiliates: n/a
- (8) None of the persons/entities in items 5 – 7 above have had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (9) PBXIO's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (10) PBXIO has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (11) PBXIO is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (12) PBXIO's Operating Company Number is 727J.


David Burr