

Robocall Mitigation Compliance with TRACED Act

- nexVortex, LLC

nexVortex, LLC a voice service provider, (the “Company”), submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to Section 64.6305 of the FCC’s rules.

A list of the Company’s Principals, Affiliates, Subsidiaries and Parent Companies can be found in the Appendix.

STIR/SHAKEN

The Company has fully implemented STIR/SHAKEN. All calls that the Company originates are compliant with Sections 64.6301(a)(1) and (2) of the Commission’s rules.

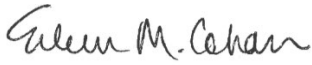
TRACEBACK

The Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. The Company will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our service to carry, process, or originate robocalls.

ENFORCEMENT

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan. The Company has never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program. The Company has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

I, Eileen Cohan, submit this certification on behalf of the Company which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.



_____ (signature)

September 16, 2025

_____ (date)

MITIGATION PROGRAM

As detailed below, Company has taken specific reasonable steps to avoid, the origination, carrying, or processing of illegal robocall traffic. All voice traffic that originates on our network is subject to the below Robocall Mitigation Plan.

The Company monitors its network to identify suspicious traffic patterns, and has implemented anti-spoofing tools on its network to identify and block illegal calls and traffic. The Company uses tools purchased from trusted third parties including: Somos (from whom the Company purchases a commercial DNO list) and YouMail Watch Call Detail Record service (“YouMail CDR”) (a traffic monitoring service). Based on information the Company receives from ITG, YouMail CDR, Somos and other carrier information, the Company maintains an internal Do Not Originate (“DNO”) list. The Company periodically updates its tools and internal DNO list to detect and include invalid phone number formats, area codes, and unassigned number blocks. The Company also utilizes internal data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Company’s Know Your Customer (KYC) requirements and processes include:

- Limiting a customer’s capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- Vetting all new customers with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company does not onboard a new customer until these processes are complete.

The Company examines the identity of its customers prior to entering into any contract to provide service. The Company does not onboard a customer if it is unable to verify the customer’s identification. This verification process includes confirmation of business names and addresses, EIN confirmation, confirmation of reseller in secretary of state databases and website verifications.

The Company has an Upstream Provider Policy, pursuant to which the Company will confirm that its upstream providers are appropriately listed in the FCC’s RMD and has not been delisted pursuant to an enforcement action.

The Company’s service agreements contain acceptable use and traffic integrity terms that prohibit the use of Company services for illegal purposes. Pursuant to the terms of our service agreements, the Company may terminate services for fraudulent use of our services, for illegal, improper or unauthorized use of services, and/or for violations of any laws, rules and regulations applicable to the use of Company services. Additionally, the Company may block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company’s networks.

The Company will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.

The Company reserves the right to modify and/or supplement this Robocall Mitigation Plan to adapt to risks and to improve the overall effectiveness of our program.

APPENDIX

BCM One, Inc.

Contact Person: Douglas Fechter, Chief Financial Officer

Address: 751 Arbor Way, Suite 150, Blue Bell, PA 19422

Phone No.: 212-849-2202

Email address: regulatory@bcmone.com

OCN: 738j

Arena One, LLC

Contact Person: Douglas Fechter, Chief Financial Officer

Address: 751 Arbor Way, Suite 150, Blue Bell, PA 19422

Phone No.: 212-849-2202

Email address: regulatory@bcmone.com

OCN: 738j

CoreDial, LLC

Contact Person: Jennifer Nading, SVP Customer Operations

Address: 751 Arbor Way, Suite 150, Blue Bell, PA 19422

Phone No.: 747-777-8100 x4619

Email address: regulatory@bcmone.com

OCN: 738j

BCM One Cloud Communications, LLC

Contact Person: Douglas Fechter, Chief Financial Officer

Address: 12725 Morris Road, Suite 420, Alpharetta, GA 30004

Phone No.: 212-849-2202

Email address: regulatory@bcmone.com

OCN: 738j

nexVortex, LLC

Contact Person: Lita Miller, Chief Customer Officer

Address: 510 Spring Street, Herndon, VA 20170

Phone No.: 703-439-2726

Email address: regulatory@bcmone.com

OCN: 738j

PayG, LLC dba SkySwitch

Contact Person: Jennifer Nading, SVP Customer Operations

Address: 751 Arbor Way, Suite 150, Blue Bell, PA 19422

Phone No.: 747-777-8100 x4619

Email address: regulatory@bcmone.com

OCN: 738j

SIP.US LLC

Contact Person: Lita Miller, Chief Customer Officer

Address: 12725 Morris Road, Suite 420, Alpharetta, GA 30004

Phone No.: 703-439-2726

Email address: regulatory@bcmone.com

OCN: 738j

Wholesale Carrier Services, Inc.

Contact Person: Randy Lemmo, SVP Global Network Engineering & Operations

Address: 751 Arbor Way, Suite 150, Blue Bell, PA 19422

Phone No.: 954-905-4241

Email address: regulatory@bcmone.com

OCN: 738j

Pure IP US LLC

Contact Person: Tara-Elese Galea, Vice-President of Operations, Pure IP

Address: 751 Arbor Way, Suite 150, Blue Bell, PA 19422

Phone No.: 415-800-0799

Email address: legalcomp@pure-ip.com

OCN: 738j

BCM ONE OFFICERS, MANAGERS AND DIRECTORS

BCM One Group Holdings, Inc.

(Delaware; September 14, 2018)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
Alexander Guzov	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Chief Executive Officer
Marc Fribush	Outside Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

BCM One, Inc. (f/k/a McGraw Communications, Inc.)

(New York; June 25, 1996)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
Alexander Guzov	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

BCM One Acquisition, Inc.

(New York; June 23, 2016)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
Alexander Guzov	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

BCM One, Inc.

(Virginia; May 5, 2002)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
Alexander Guzov	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

WCS Asia, Inc.

(Philippines; May 3, 2013 initially formed as SinglePoint Call Centers, Inc.)

Jesse Klein
Geoffrey Bloss
Albert Joseph Gan

Officers:

Jesse Klein	Chairman
Geoffrey Bloss	President
Albert Joseph Gan	Treasurer
Ina Alexandra A.	Corporate Secretary
Alvin R. Tan	Assistant Corporate Secretary

Wholesale Carrier Services, Inc.

(Delaware; July 15, 2021; initially formed in Florida on May 20, 1996)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
Alexander Guzov	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Wholesale Carrier Services of Virginia, Inc.

(Virginia; October 11, 2007)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
Alexander Guzov	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Business Communications Management, LLC

(New York; November 14, 1991; formerly Business Communications Management, Inc. – converted to LLC November 16, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

SIP.US LLC

(Delaware; May 30, 2012; initially formed in Florida, converted to Delaware on February 6, 2019)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

PayG, LLC

(Delaware; May 10, 2011; initially formed in Florida, converted to Delaware on December 21, 2020)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Outforce, Inc.¹
(Florida; May 25, 2017)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
Alexander Guzov	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

ReachUC LLC
(Delaware; July 22, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

¹ Note to Draft: Targeted for dissolution.

ConnectUC LLC

(Delaware; March 27, 2023)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

VoIPSync, LLC

(Delaware; December 12, 2024)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

nexVortex, LLC

(Delaware; August 15, 2002; formerly nexVortex Inc. – converted to LLC July 30, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

CoreDial, LLC

(Delaware; July 18, 2005)
Sole Member: SIP.US LLC

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Voice4net.com, LLC

(Delaware; December 17, 1996; initially formed in Texas as Voice4net.com, Inc., converted to Delaware on November 17, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

CoreNexa, LLC

(Delaware; August 12, 2016; initially formed in Pennsylvania, converted to Delaware on November 17, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

CD Meetings, LLC

(Delaware; August 17, 2020)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

LincLogix, LLC

(Delaware; March 6, 2003; December 21, 2020; initially formed in Indiana, converted to Delaware on December 21, 2020)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

BCM One Cloud Communications, LLC

(Delaware; February 15, 2022)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

SIPTRUNK, LLC

(Delaware; July 9, 2014; formerly Business Communications Management, Inc. – converted to LLC November 15, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Arena One, LLC

(New York; September 23, 2004)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
Alexander Guzov	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Pure IP US LLC

(Delaware; November 14, 2012)

Managers:

Jesse Klein	Fund Manager
Alexander Guzov	Fund Manager
Sandy Preizler	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Pure IP New York LLC

(Delaware; September 4, 2013)

Managers:

Jesse Klein	Fund Manager
Alexander Guzov	Fund Manager
Sandy Preizler	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Pure IP California LLC

(Delaware; September 4, 2013)

Managers:

Jesse Klein	Fund Manager
Alexander Guzov	Fund Manager
Sandy Preizler	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Robert C. Dunn	Vice President
Alexander Guzov	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary