



IPtelX, LLC Robocall Mitigation Plan

IPtelX, LLC 100 Webster Street Bay City, MI 48708
Phone: 989.891.2900 Fax: 989.891.2901 telcoadmin@iptelx.net

OCN: 088J
FRN: 0024656209
499 Filer ID: 830940

Submission to the Federal Communications Commission Robocall Mitigation Database

Date: April 8, 2026

1. Executive Summary

IPtelX, LLC is a facilities-based and interconnected VoIP provider specializing in **alarm signaling, central station communications, and enterprise voice services.**

IPtelX is committed to preventing illegal robocalls and caller ID spoofing through a combination of:

- Full **STIR/SHAKEN implementation**
- Strict **Know Your Customer (KYC)** and **Know Your Upstream Provider (KYUP)** controls
- Real-time **traffic monitoring and enforcement**
- Active participation in **traceback and industry mitigation efforts**

2. STIR/SHAKEN Implementation & Attestation Policy

2.1 Certification Status

IPtelX is registered with the STI-PA and holds active certificates issued by an authorized STI-CA.

All outbound calls originated on the IPtelX network are evaluated for STIR/SHAKEN signing.



IPtelX, LLC Robocall Mitigation Plan

IPtelX, LLC 100 Webster Street Bay City, MI 48708
Phone: 989.891.2900 Fax: 989.891.2901 telcoadmin@iptelx.net

OCN: 088J
FRN: 0024656209
499 Filer ID: 830940

2.2 Attestation Policy

IPtelX applies attestation levels as follows:

A-Level Attestation Assigned when:

- IPtelX has a direct relationship with the customer
- The customer identity has been fully verified (KYC)
- The telephone number is assigned to that customer

B-Level Attestation Assigned when:

- The customer is known, but number control cannot be fully verified
- Traffic originates from enterprise or reseller scenarios with partial validation

C-Level Attestation - IPtelX does NOT originate C level traffic

2.3 Refusal to Sign

IPtelX will **refuse to sign calls** when:

- Caller ID cannot be validated
- Traffic originates from unverified or unauthorized sources
- Suspicious or anomalous behavior is detected

3. Know Your Customer (KYC)

IPtelX performs strict vetting of all customers prior to service activation.

3.1 Customer Verification Includes:

- Business identity validation (legal entity, EIN, address)
- Service use case validation
- Telephone number ownership or authorization verification
- Review of intended call patterns and volumes



IPtelX, LLC Robocall Mitigation Plan

IPtelX, LLC 100 Webster Street Bay City, MI 48708
Phone: 989.891.2900 Fax: 989.891.2901 telcoadmin@iptelx.net

OCN: 088J
FRN: 0024656209
499 Filer ID: 830940

3.2 Contractual Enforcement

All customers:

- Are contractually prohibited from originating illegal robocalls
- Must comply with all FCC and industry regulations
- Are subject to immediate suspension upon violation

4. Know Your Upstream Provider (KYUP)

IPtelX applies equivalent scrutiny to **upstream carriers and interconnect partners**.

4.1 Upstream Vetting Includes:

- Verification of provider identity and OCN (if applicable)
- Confirmation of Robocall Mitigation Database listing
- Review of STIR/SHAKEN participation status
- Evaluation of traffic origin transparency

4.2 Traffic Acceptance Policy

IPtelX:

- Only accepts traffic from **known and vetted upstream providers**
- Rejects traffic from unidentified or unverifiable sources
- Applies additional scrutiny to:
 - International traffic
 - Gateway-originated traffic
 - High-volume sources



IPtelX, LLC Robocall Mitigation Plan

IPtelX, LLC 100 Webster Street Bay City, MI 48708
Phone: 989.891.2900 Fax: 989.891.2901 telcoadmin@iptelx.net

OCN: 088J
FRN: 0024656209
499 Filer ID: 830940

5. Traffic Monitoring & Analytics

IPtelX employs real-time monitoring systems to detect and mitigate illegal robocall activity.

5.1 Detection Mechanisms Include:

- Call volume anomaly detection (sudden spikes)
- Short duration / high-velocity call pattern analysis
- Abnormal Answer-Seizure Ratio (ASR) monitoring
- Repeated calling patterns to sequential or high-risk destinations
- Invalid or unallocated number usage

5.2 Enforcement Actions

Upon detection of suspicious activity, IPtelX may:

- Immediately block outbound traffic
- Apply rate limiting controls
- Suspend or terminate customer accounts
- Reject upstream traffic at ingress
- Escalate to internal compliance review

Response time: near real-time to minutes depending on severity.

6. Call Blocking & Traffic Controls

IPtelX proactively blocks and filters traffic that is likely to be illegal.

6.1 Blocking Includes:

- Invalid, unallocated, or spoofed numbers
- Known high-risk numbering patterns
- Traffic failing STIR/SHAKEN validation checks (where applicable)
- Traffic from non-compliant upstream providers



IPtelX, LLC Robocall Mitigation Plan

IPtelX, LLC 100 Webster Street Bay City, MI 48708
Phone: 989.891.2900 Fax: 989.891.2901 telcoadmin@iptelx.net

OCN: 088J
FRN: 0024656209
499 Filer ID: 830940

6.2 Additional Controls

- Dynamic routing restrictions based on behavior
- Selective blocking of high-risk destinations when abuse is detected

7. Traceback Cooperation

IPtelX fully cooperates with traceback efforts.

7.1 Commitments:

- Respond to traceback requests **within 24 hours or faster**
- Maintain a 24/7 contact for urgent requests
- Preserve call records and logs for investigations

7.2 Industry Participation

IPtelX supports and cooperates with the Industry Traceback Group and other regulatory or law enforcement bodies.

8. Special Traffic Classification — Alarm & Life-Safety

IPtelX specializes in **alarm signaling and central station communications**, which differ significantly from traditional voice traffic.

8.1 Characteristics:

- Low call volume per endpoint
- Machine-originated signaling
- Critical for emergency response workflows

8.2 Mitigation Approach:

- All alarm traffic originates from **fully vetted central station customers**
- Traffic patterns are highly predictable and monitored
- Any deviation from expected patterns triggers investigation



IPtelX, LLC Robocall Mitigation Plan

IPtelX, LLC 100 Webster Street Bay City, MI 48708
Phone: 989.891.2900 Fax: 989.891.2901 telcoadmin@iptelx.net

OCN: 088J
FRN: 0024656209
499 Filer ID: 830940

8.3 Carrier Coordination:

IPtelX works with downstream carriers to:

- Identify alarm traffic patterns
- Reduce false positives in analytics engines
- Ensure life-safety communications are not improperly blocked

9. Continuous Improvement

IPtelX continuously enhances its mitigation framework by:

- Updating detection algorithms
- Reviewing customer and upstream provider risk profiles
- Aligning with evolving FCC rules and carrier requirements
- Participating in industry initiatives (including branded calling / BCID ecosystem)

10. Certification

I certify that:

- IPtelX, LLC has implemented the robocall mitigation practices described above
- These practices comply with all applicable FCC rules and regulations
- The information provided is true and accurate to the best of my knowledge

A handwritten signature in black ink, appearing to read 'S. Tabor', written over a horizontal line.

Scott Tabor
Director of Telecom Engineering
IPtelX, LLC **Date:** April 8, 2026