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To whom it may concern:

This is an update to our current filing on 2022.03.28

Our current certification level is Option2 – Partial STIR/SHAKEN Implementation.
This remains unchanged.

Our client's networks do not implement STIR/SHAKEN but our carrier VOIP Innovations (VI) does. To my knowledge, VI will not forward traffic which fails any of their STIR/SHAKEN protocols.

As I understand it, a good portion of unwanted robocalls stem from improperly configured PBX's allowing unwanted endpoint registrations from nearly anywhere on the internet. Therefore, I attest to the absolute fact that our client networks DO NOT allow any SIP registrations from unknown endpoints. This means that any PBX that we manage for our clients, and which originates and terminates voice traffic to & from our carrier VI, has a strictly controlled procedures for registering endpoints, sending traffic to VI, receiving traffic from VI, and advertising DIDs registered with VI.

Being an IT & data security company, we approach all network connectivity options the same way: zero trust, encrypted connections, double backups, network monitoring, periodic auditing.

Managing our clients' account at VI provides multiple added security layers:

- Multi-factor authentication ensures that only two people from our staff are allowed to access these accounts
- DID's cannot be added or altered without our knowledge
- All DID's owned by clients are registered to their accounts with specific location/address information
- No contact information can be edited without our knowledge or specific logins
- Bypass mechanisms for routing, forwarding, or failover cannot be edited without our knowledge

Managing our clients' phone systems provides additional security layers:

- Configured outbound DID's exist ONLY at VI and nowhere else
- No spoofed DID's are ever entered or allowed on these systems

Managing our clients' data network provides additional inherent security layers:

- Dedicated firewalls between each PBX we manage and its dedicated internet connection ensures that 100% of SIP traffic can only be accepted from nine (9) of VI's static IP addresses
- Outbound SIP traffic can ONLY be sent through VI's network & nowhere else through static routes

Currently having less than 25 clients (and dropping) for whom we manage and bill for these voice services inherently provides a unique perspective. Our manually generated & reviewed monthly billing cycle gives us the opportunity to notice each client's monthly usage. Too much increase from prior months indicates either a new marketing campaign or fraud. Reviewing call records then allows us to determine which is the case. If fraud was ever discovered, we would be in the position to immediately investigate, diagnose and mitigate the faulty condition.

Finally, and most significantly for our business model, due to the increasingly competitive nature of the VOIP business along with newer UCaaS features we cannot provide or keep up with, **it is our 24 month plan to eliminate all of our installed PBX configurations, discontinue all services with VoIP Innovations, and place all client voice services with various other dedicated full-service providers**, two of whom are BroadVoice and Virtual PBX. It is my sincere hope that the next time I must revise an FRN filing is to close my account.

I believe, and hope, that the above new and/or updated information and additional details will be sufficient to keep our account in good standing. If not, please let us know as soon as possible so that we can take further steps to ensure that the FCC's requirements are met.

Best Regards,
Richard Papasian