



Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by Nexivity, LLC, headquartered at 11 Dinev Road, Suite 003, Monroe, NY 10950.

Role in the Call Chain

Nexivity, LLC performs the following roles:

- A Voice Service Provider serving end users with a STIR/SHAKEN implementation obligation
- An originating service provider that signs outbound calls using its own STIR/SHAKEN certificate
- Nexivity's downstream / next-hop carrier is VoIP Innovations / Sangoma (RMD0003709)

Eligibility and Enforcement History

Nexivity, LLC has not been prohibited from filing a certification in the Robocall Mitigation Database.

Neither Nexivity, LLC nor any of its executives or principals have a history of enforcement actions related to illegal robocalls, TCPA violations, TSR violations, or related state laws.

Robocall Prevention Measures

Nexivity, LLC employs affirmative and effective measures to prevent the origination or transit of illegal robocalls, including the following controls.

Know Your Customer (KYC)

Nexivity follows best practices for customer vetting and caller identity verification as outlined by the NANC Call Authentication Trust Anchor Working Group, including customer identity verification, service use validation, and ongoing monitoring.

(Reference: <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback Cooperation

Nexivity responds within 24 hours to all traceback requests from:

- The Federal Communications Commission
- Law enforcement agencies
- The registered traceback consortium

Nexivity cooperates fully in investigating and stopping any illegal robocallers that use our service to originate calls.



STIR/SHAKEN Implementation

Nexivity, LLC has implemented STIR/SHAKEN and signs outbound calls using its own certificate.

- Nexivity holds an SPC issued by the STI-PA under OCN 995L
- Nexivity's STI Certification Authority (STI-CA) and Network Secure Signing Service (NSS) are provided by Telonium Communications
- All originating calls are routed through Telonium's signing infrastructure, where calls are authenticated and signed with Nexivity's certificate before delivery to the downstream carrier
- Nexivity's downstream carrier, VoIP Innovations / Sangoma (RMD0003709), receives calls that are already signed and authenticated

All voice traffic originating from Nexivity's network is subject to the robocall mitigation program described below.

Robocall Mitigation Program

Nexivity utilizes call analytics, monitoring, and mitigation controls provided by its network partners to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. These measures include:

- Fraud Detection: Identification of high-volume robocalling, spoofing, and spam call activity.
- Call Authentication: STIR/SHAKEN signing with Nexivity's certificate to support call verification.
- Subscriber Notification: Caller ID Name override to warn subscribers of suspicious calls.
- Call Blocking Support: Accurate identification enabling call blocking of fraudulent calls consistent with the TRACED Act (2019).
- Business Number Verification: Registration and validation of legitimate originating numbers.
- Caller ID Name Service: Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.
- Do Not Originate (DNO) Protection: Screening of outbound calls against national DNO lists via Telonium's DNO services

Call Abuse Policy

Nexivity maintains and enforces a Call Abuse Policy, which is published on our website, terms of service and communicated to customers. The policy includes the following:

"Any call originated on the Nexivity LLC network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. Repeated or excessive violations may result in service suspension or termination and may be referred to the FCC or other authorities for enforcement under the TRACED Act or applicable law, and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court."