

Robocall Mitigation Program of IPPBX LLC

(Prepared pursuant to 47 CFR §64.6305(d)(ii)–(iii) and DA 24-73)

1. Business Information

- Legal Entity: IPPBX LLC
 - FRN: 0031255193
 - Address: 718 Walt Whitman Rd, Melville, NY 11747
 - Contact Person: Mark Khan | Compliance Officer
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2. Role in the Call Chain

- IPPBX LLC operates solely as a reseller of voice services.
- IPPBX does not own or control switching or interconnection infrastructure and therefore cannot directly perform STIR/SHAKEN call authentication.
- All outbound traffic from IPPBX customers is routed through upstream carriers who:
 - Certify full STIR/SHAKEN implementation on their IP networks.
 - Maintain FCC-compliant robocall mitigation programs.
 - Cooperate in traceback and enforcement.

IPPBX ensures that every call it handles benefits from authentication and mitigation protections applied by its upstream partners.

3. Robocall Mitigation Program Description

(per 47 CFR §64.6305(d)(ii)-(iii))

A. Know Your Customer (KYC) Procedures

IPPBX LLC applies a risk-based Know Your Customer (KYC) process prior to service activation and throughout the customer lifecycle. Verification of customer identity (entity name, tax ID, physical address, authorized representative ID).

At onboarding, all customers are required to provide:

- Legal entity name and ownership information
- Government-issued photo identification for authorized representatives

- Business formation documents (for business customers)
- Federal EIN / Tax ID
- Physical service address and verifiable contact information
- A description of the intended calling use case, expected call volumes, and destinations

All new accounts are **manually reviewed by compliance staff** prior to activation. Accounts are initially placed on **restricted calling limits** (including call rate, volume thresholds, and destination scope). These restrictions are lifted only after traffic patterns are validated as consistent with the stated lawful use case.

IPPBX performs **ongoing customer monitoring and review**, including:

- Periodic reassessment of call behavior
- Review of account changes and payment activity
- Immediate investigation upon receipt of carrier complaints, traceback requests, or anomaly alerts

IPPBX reserves the right to **immediately suspend or terminate service** for any customer suspected of illegal robocalling, spoofing, fraud, or violations of its Acceptable Use Policy.

B. Call Analytics & Monitoring

IPPBX monitors traffic using internal monitoring tools and carrier feedback to identify potential illegal robocalling activity, including:

- High-volume, short-duration calling patterns
- Sudden spikes in call attempts per second
- Invalid, unassigned, or unauthorized caller ID usage
- Traffic is inconsistent with the customer's stated use case

Investigations are triggered automatically when thresholds are exceeded. Compliance staff review call detail records (CDRs), customer history, and traffic routing paths. Confirmed violations result in immediate enforcement actions, including suspension or termination of service.

IPPBX does not currently use a third-party call analytics vendor. Monitoring is performed internally in coordination with alerts and feedback from upstream carriers. If a third-party analytics solution is implemented in the future, IPPBX will update its Robocall Mitigation Database filing accordingly.

C. Cooperation with Traceback

- IPPBX cooperates fully with the Industry Traceback Group (ITG).
- IPPBX commits to respond to traceback requests within 24 hours.
- Dedicated compliance staff ensure timely and accurate responses to law enforcement and FCC inquiries.

D. Upstream Provider Compliance

IPPBX contracts only with upstream carriers that:

- Have filed valid STIR/SHAKEN certifications in the Robocall Mitigation Database.
- Maintain robocall mitigation programs and agree to continued compliance.

Our current upstream providers are:

1. Peerless Network, Inc – FRN: 0017253535
2. **USA Digital Communications, Inc. ** – FRN: 0004272886

IPPBX has obtained written assurances from these upstream carriers confirming their compliance with FCC requirements and STIR/SHAKEN implementation.

4. Certification Statement

I, Mark Khan, Compliance Officer of IPPBX LLC, certify under penalty of perjury that:

1. IPPBX has adopted and enforces the above-described robocall mitigation program.
2. IPPBX's role is limited to reselling services, and all outbound traffic is passed to upstream carriers that fully implement STIR/SHAKEN.
3. IPPBX actively prevents its services from being used to originate illegal robocalls by enforcing strong KYC, AUP, and monitoring procedures.
4. IPPBX commits to responding to all traceback requests within 24 hours and to cooperate fully with the FCC, ITG, and law enforcement.

Mark Khan

Signed:

Mark Khan

Compliance Officer, IPPBX LLC

27-Aug-25