

Subject: Certification and Robocall Mitigation Plan Submission

Dear Commissioners,

Executive Telephony Solutions, Inc. (Hereafter, ET) submits this certification and accompanying Robocall Mitigation Plan to comply with the FCC's amended rule for the Robocall Mitigation Database (RMD). Below, we provide the requested information and affirm our commitment to the FCC's objectives to combat illegal robocalls.

1. Certification Statement

- **Robocall Mitigation Program:** All calls originating on ET's network are subject to an established and effective robocall mitigation program.
 - **Certification Status:** ET affirms that no prior certification has been removed by Commission action, nor has ET been prohibited from filing in the RMD.
 - **STIR/SHAKEN Implementation:** ET has partially implemented STIR/SHAKEN on the Internet Protocol portions of our network. We remain committed to full implementation and continue to enhance our systems to meet this objective.
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2. Robocall Mitigation Plan

(a) Preventing Illegal Robocall Origination

ET employs stringent measures to ensure that new and renewing customers do not originate illegal robocalls:

- **Know Your Customer (KYC) Policy:** All prospective customers undergo a thorough vetting process that includes a one-on-one conversation to establish a clear understanding of their intended use of services. Automated online sign-ups are not permitted.
- **Traffic Monitoring:** ET regularly monitors customer traffic for abnormal call patterns or volumes that may indicate potential misuse. Any suspicious activity is promptly investigated and addressed.

(b) Call Analytics Systems

ET utilizes a combination of in-house and third-party analytics systems to identify and block illegal traffic:

- **Randomizer System:** This system challenges calls routed via Least Cost Routing (LCR) engines by requiring the caller to input random digits, effectively blocking machine-generated robocalls.
- **Automatic Number Identification (ANI) Management:** Repeated attempts from abusive numbers are flagged and blocked.
- **Proactive Blocking:** ET blocks calls originating from:
 - Numbers on Do-Not-Originate (DNO) lists from US Telecom and Neustar.
 - Invalid, unallocated, or unused numbers.
- **Third-Party Collaboration:** ET leverages third-party resources, including Neustar and fraud

information shared within the industry, to enhance robocall mitigation efforts.

(c) Upstream Provider Procedures

ET maintains a robust “Know Your Upstream Provider” protocol:

- All upstream providers are required to maintain their own robocall mitigation programs.
 - Our primary upstream provider, Vitelity, has achieved full STIR/SHAKEN compliance, ensuring the integrity of call traffic routed through their systems.
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3. Business and Contact Information

- **Business Name:** Executive Telephony Solutions, Inc. (ET)
 - **Business Address:** P.O. Box 92885 Southlake, TX 76092
 - **Point of Contact:** Richard Holliday, Principal, Rholliday@executivetelephony.com, 817-329-5521 x465
 - **Principals, Affiliates, Subsidiaries, and Parent Companies:** None
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4. Additional Information

(a) Role in the Call Chain

ET serves as a private hosted PBX provider, utilizing SIP dial tone from third-party entities, specifically Vitelity-Sinch

(b) STIR/SHAKEN Implementation Extension or Exemption

ET has no current claims for extensions or exemptions regarding STIR/SHAKEN implementation.

(c) Enforcement or Investigation History

Neither ET nor any affiliated entities have been subject to Commission or other law enforcement actions or investigations in the past two years concerning illegal robocalling, spoofing, or deficiencies in RMD certification.

(d) Commitment to Traceback Response

ET commits to responding fully to all traceback requests within 24 hours, cooperating with the Commission, law enforcement, and the industry traceback consortium to investigate and halt illegal robocall activities.

ET remains fully dedicated to complying with FCC regulations and implementing robust measures to combat illegal robocalls. Please let us know if additional information or clarification is required.

Sincerely,
Richard Holliday

Principal
Executive Telephony Solutions, Inc.
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