

CFX Business Solutions Inc. Robocall Mitigation Program Description

Filed pursuant to 47 CFR § 64.6305(d)(ii)-(iii)

1. Company Overview CFX Business Solutions Inc. is a U.S.-based office products company that messaging and communications provider established in 2015. CFX Business Solutions Inc. enables Small Business and medium enterprise clients — including Small businesses, franchised dealerships, financial, education providers, and staffing companies — to send lawful, informational communications to their customers. CFX Business Solutions Inc. does not provide general-purpose origination services to the public, nor does it operate as a residential or high-volume telemarketer.

2. STIR/SHAKEN Implementation Status CFX Business Solutions Inc. originates all calls through FCC-registered upstream carriers (VOIP innovations (Sangoma), Voip.ms, Bandwidth, Telnyx, etc.), who perform STIR/SHAKEN call authentication and attestation. CFX Business Solutions Inc. does not control or alter STIR/SHAKEN signing directly, but it ensures that:

- Only verified numbers assigned to or owned by clients are used as Caller ID.
- Caller ID is never spoofed, altered, or substituted.
- Calls are routed exclusively through carriers that have implemented STIR/SHAKEN.

3. Robocall Mitigation Program (47 CFR § 64.6305(d)(ii)) CFX Business Solutions Inc. maintains and enforces the following measures to prevent the origination of unlawful robocalls:

a. Know Your Customer (KYC):

- All clients undergo vetting before being granted access to calling services.
- Only established enterprise-level organizations with proven business use cases are supported.

b. Restricted Use Cases:

- CFX Business Solutions Inc. prohibits high-volume, autodialer-driven, or randomized robocalls.
- Calls are limited to legitimate transactional and informational purposes, such as service reminders, recall notifications, fraud alerts, and appointment confirmations.

c. Consent and Compliance:

- Clients must maintain documented consent (TCPA-compliant opt-in) for all consumer communications.
- Opt-outs are enforced immediately across CFX Business Solutions Inc. databases and cannot be overridden.

d. Reassigned Number Database (RND) Checks:

- CFX Business Solutions Inc. integrates with the FCC's RND to suppress calls and texts to disconnected or reassigned numbers.
- Numbers not previously verified within 90 days are automatically re-checked before new communications are sent.

e. Monitoring & Controls:

- All outbound traffic is logged and monitored for anomalies.
- Traffic is restricted by rate-limiting, number verification, and campaign-level approvals.
- Any detected abuse results in immediate suspension and investigation.

f. Complaint & Enforcement Response:

- Consumer complaints or carrier traceback requests are reviewed immediately.
- Offending client traffic can be suspended or terminated.
- Records are retained for traceback cooperation with the FCC, FTC, and law enforcement.

4. Compliance Contact (47 CFR §

64.6305(d)(iii)) Name: [Insert Name] Title: Compliance Officer Department: Regulatory & Carrier Relations Business Address: [Telephone: [Insert Direct Number] Email: compliance@mycfx.com 5. Certification CFX Business Solutions Inc. certifies that it: • Does not knowingly or negligently originate illegal robocall traffic onto the PSTN. • Implements a robust robocall mitigation program consistent with 47 CFR § 64.6305(d)(ii). • Maintains an identified compliance contact as required by 47 CFR § 64.6305(d)(iii).