

XPRO NETWORKS ROBOCALL MITIGATION

Xpro Networks LLC (Xpro) and its affiliates follow industry best practices for vetting callers as noted in the NANC Call Authentication Trust Anchor Working Group practices. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Xpro will respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium, and work together researching and mitigating illegal robocallers that originate calls on our systems.

Xpro is a small ITSP, with fewer than 25,000 voice service lines and is subject to extensions and exemptions until June 30, 2023 of STIR SHAKEN Implementation under 47 C.F.R. §64.6304(a).

Xpro is executing protocols requiring all call originations to follow strict standards. We monitor outbound traffic on a regular schedule provided by our mitigation compliant SIP providers, monitoring traffic to spot and prevent the origination of illegal robocalls and to terminate the calling activity of illegal robocall operators. Xpro SIP providers identify suspected illegal robocalls and alerts us if known violations occur. Additionally due to Xpro's relatively limited daily call volume, CDR and PBX reporting mechanisms capably trigger unusual call activity allowing operations managers to focus in on operators with a high number of unterminated calls or calls unallocated. Xpro immediately investigates calls believed to potentially fit within patterns of illegal robocallers and, if we determine that callers are in fact executing illegal robocalls we provide one warning by email, a second warning by call to the executive or account representative in question accompanied by a final warning sent by certified mail, and in the third case we terminate the business service of the offending party.