

Robocall Mitigation Plan – 9x9 Technologies

1. Robocall Mitigation Program

9x9 Technologies implements a comprehensive robocall mitigation program that includes reasonable steps to avoid originating illegal traffic. We recognize our obligations under 47 CFR § 64.6305(a) and affirm our commitment to protect the public telephone network from unlawful robocalls.

2. Customer & Upstream Vetting (“Know Your Customer”)

- **Onboarding Verification**
 - All new customers must provide valid government-issued identification, proof of address, and (for businesses) formation documents such as articles of incorporation or business registration certificates.
 - Customer information is cross-checked against industry “bad actor” databases and consortium alerts.
 - Service is not provisioned until the customer passes identity verification.
 - **Ongoing Monitoring**
 - Customer call patterns are continuously monitored for suspicious activity, including abnormal volumes, short-duration traffic, sequential dialing, and use of invalid or unassigned Caller IDs.
 - Any customer found using spoofed Caller ID or originating illegal traffic is immediately suspended pending investigation and may be permanently terminated.
 - **Underlying Carriers**
 - All outbound calls are delivered exclusively through BulkVS and Telnyx, both of which are fully compliant with FCC robocall mitigation rules.
 - These carriers have fully implemented STIR/SHAKEN and apply their own advanced analytics to detect and block unlawful traffic.
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3. Analytics & Internal Monitoring

9x9 Technologies supplements the protections provided by its upstream carriers with its own PBX-level monitoring measures:

- **Call Records Review**
 - Call detail records are regularly reviewed for indicators of unlawful robocalling, including invalid or blank Caller IDs, excessive call attempts in short timeframes, and abnormally short call durations.
- **Caller ID Enforcement**
 - Caller ID values are provisioned by 9x9 Technologies staff and **cannot be modified by customers through the web portal or user interface.**
 - Calls presenting unassigned or invalid Caller IDs are automatically blocked.
- **Fraud Detection & Thresholds**
 - Per-account limits on concurrent calls and calls per second are enforced to prevent auto-dialer activity.
 - Abnormal call patterns trigger alerts and may result in blocking or suspension of service.
- **Real-Time Alerts**
 - Our PBX is configured to generate alerts when traffic exceeds expected thresholds, when repeated call failures occur, or when unusual destinations are detected.

4. STIR/SHAKEN Implementation Status

9x9 Technologies has **not directly implemented STIR/SHAKEN** on its own facilities. However, **100% of our outbound calls are delivered through BulkVS and Telnyx, both of which have fully implemented STIR/SHAKEN and sign calls on our behalf.**

- We have confirmed with each upstream carrier that they sign our outbound calls.
- We monitor these arrangements on an ongoing basis.
- Documentation will be provided to the Commission upon request.

Exemption Basis: 47 CFR § 64.6304

Explanation: 9x9 Technologies does not maintain direct IP interconnections to the PSTN.

Because all outbound traffic is delivered through BulkVS and Telnyx, who perform STIR/SHAKEN signing, we qualify for exemption under § 64.6304.

5. Traceback Response Commitment

9x9 Technologies will respond to **all traceback requests within 24 hours** and fully cooperate with the Commission, law enforcement, and the traceback consortium.

6. RMD Certification & Recertification Compliance

- We will maintain our certification in the Robocall Mitigation Database (RMD).
 - We will recertify annually and update filings within **10 business days** of any material changes.
 - We acknowledge the RMD filing fee (\$100) and understand penalties for inaccurate or late filings.
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7. Enforcement & Service Termination

- Customers found originating illegal robocalls will be immediately suspended or terminated.
 - We will fully cooperate with any FCC enforcement actions.
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8. Compliance History and Corrective Actions

- On **August 6, 2025**, and **August 25, 2025**, the FCC Enforcement Bureau issued removal orders against 9x9 Technologies, resulting in our temporary removal from the RMD.
- These actions were based on administrative noncompliance (insufficient KYC detail and missed RMD filing updates by the February 26, 2024 deadline).
- On **September 2, 2025**, the Bureau provisionally reinstated our filing, subject to correction of deficiencies.
- No findings of intentional misconduct or unlawful robocall origination were made.

- We have now updated our filing with a strengthened KYC section and clarified exemption under 47 CFR § 64.6304.
- Going forward, we have implemented internal monitoring and escalation processes to ensure all FCC communications are addressed within required timelines.