

Robocall Mitigation Plan

Company Name: CDS Office Technologies

FCC Registration Number (FRN): 0031444748

Date: 02/26/2026

Roles Performed: Originating Voice Service Provider, Terminating Voice Service Provider

1. STIR/SHAKEN Implementation

CDS Office Technologies acts as the Originating Voice Service Provider for clients utilizing our hosted 3CX PBX environments. We actively authenticate and verify Caller ID information across our network before routing traffic to our underlying carrier, Flowroute. To accomplish this, we utilize the STIR/SHAKEN framework tools provided by TransNexus ClearIP.

- **STI Certificate:** CDS Office Technologies has registered with the STI-PA and obtained an SPC token. All outbound calls are signed using our own STIR/SHAKEN certificate issued by the TransNexus STI-CA. While we utilize TransNexus ClearIP as our technical platform, CDS Office Technologies maintains sole control over attestation decisions.
- **Authentication:** We authenticate all outbound SIP calls originated by our subscribers with U.S. NANP calling numbers. We utilize ClearIP to generate the appropriate STIR/SHAKEN Identity headers for traffic exiting our hosted 3CX servers before passing the calls to our SIP trunking provider.
- **Verification:** We evaluate inbound SIP calls destined for our 3CX clients utilizing the STIR/SHAKEN verification features within ClearIP, ensuring the integrity of the caller ID data before delivering the call to the terminating end-user.

2. Call Analytics and Robocall Mitigation Systems

To prevent the origination and processing of illegal robocalls from our hosted environments, we employ tools from our primary third-party call analytics vendor, TransNexus ClearIP. We are able to provide real-time traffic analysis and automated mitigation by using the tools ClearIP provides:

- **Dynamic Traffic Analysis (SIP Analytics):** We monitor outbound traffic patterns from our 3CX instances in real time. Using ClearIP's SIP Analytics, we continuously compare cumulative call counts against dynamic thresholds to detect and isolate anomalous calling events indicative of robocalling.

- **Shield Database and DNO Lists:** We actively screen outbound and inbound calls against known invalid, unallocated, and high-risk numbers, as well as the industry Do-Not-Originate (DNO) registry, by querying the ClearIP Shield database.
- **Automated Blocking and Routing:** When our systems, aided by ClearIP's analysis, flag a call as a suspected robocall, our network automatically executes a mitigation response by dropping the call with a SIP 603 Decline response, preventing the traffic from reaching our underlying carrier or indicate the call by replacing the CNAM with <SPAM>.

3. Know Your Customer (KYC) & Upstream Provider Procedures

- **For Originating Traffic (KYC):** As a Managed Service Provider (MSP), CDS Office Technologies maintains deep, verified relationships with our clients. We do not offer self-service SIP trunking to the general public. Our vetting procedure includes:
 - Establishing formal Master Service Agreements (MSAs) and verifying the physical and corporate identity of the business.
 - Designing, deploying, and managing the 3CX PBX systems ourselves, which gives us absolute visibility into the expected traffic profiles and use cases of each client.
 - Enforcing Acceptable Use Policies (AUP) that explicitly prohibit illegal robocalling, telemarketing violations, and caller ID spoofing.
- **For Upstream Carrier Traffic:** We utilize Flowroute as our primary underlying SIP trunking provider. We verify that our upstream partners maintain valid, current certifications in the FCC's Robocall Mitigation Database.

4. Traceback Commitment and Cooperation

CDS Office Technologies is fully committed to assisting law enforcement and industry efforts to track down the sources of illegal robocalls. Because we manage the end-user 3CX environments, we can rapidly identify the exact source of any originating traffic.

- We maintain a designated point of contact specifically for traceback requests.
- We commit to responding fully to all traceback requests from the FCC, civil/criminal law enforcement, and the official Industry Traceback Consortium within **24 hours** of receipt.

5. Enforcement History

CDS Office Technologies has no history of enforcement actions or investigations by the FCC or any state authority related to illegal robocalls, TCPA violations, or the Transmission of Fraudulent Caller ID information.

On August 25th 2025, the company was briefly removed from the Robocall Mitigation Database (RMD) due to an administrative deficiency (missing a required information update notice). Upon discovery, CDS Office Technologies immediately coordinated with the FCC Enforcement Bureau, cured the deficiency by updating the required contact information and certifications, and was subsequently reinstated to the database. We have since implemented stricter monitoring of FCC correspondence to ensure ongoing compliance with all RMD administrative requirements.