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Flex Technology Group Robocall Mitigation Plan (RMP)

Our Role in the call chain

Flex Technology Group subscribes to Vitelity (Sinch) SIP Calling Services which we turn around and resell to our Managed Customers. We maintain the soft pbx's for the customer and oversee the technical functions of the phone system from an admin perspective.

Know Your Upstream Provider

Flex Technology Group opts to follow best practices for vetting caller identity described by the FCC. We have been in contact and are working with our upstream carrier of the last 8 years (Vitelity / Sinch) to properly ensure that we are taking the steps necessary to comply with the FCC RMD regulations. Our upstream provider (Vitelity) implements Stir/Shaken on their network prior to the call passing through to our customers soft pbx IP addresses.

Traceback

Flex Technology plans to respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium, as well as cooperates with such entities in investigating and stopping any illegal Robocalls that traverse our voice networks to originate calls fully and within a 24-hour period.

STIR/SHAKEN Implementation Status

We introduced the STIR/SHAKEN authentication framework under Origination ID: cddd20ec-927d-46e8-8f58-07f8b7af4c9e in which we are signing our customers calls outbound.

For inbound calls, we are accepting calls in from signed callee's only as they are graded by the upstream provider (Vitelity / Sinch).

Flex Technology is subject to the ongoing extension provided by 47 CFR § 64.6304 (d) for the implementation of STIR-SHAKEN. This provision exempts certain portions of the voice service provider's network from STIR-SHAKEN Caller ID Authentication. These exemptions pertain to segments of our network that rely on old transport and/or upstream provider equipment that is not capable of originating or terminating interconnected VOIP calls end to end in the setup process.

Flex Technology operates in several rural markets that rely on non-IP interconnections to market Tandems and/or various carriers to complete local and regional calls. Util upstream providers that exchanges traffic within these markets update their facilities or allow for IP Interconnections. We will continue to monitor progress on out-of-band carriers and will adhere to any FCC mandates that may

come to realization in the future. **Therefore, as of 4/19/2024 Flex Technology Group voice traffic is partially attested.**

Robocall Mitigation Program

Flex Technology Group is an Managed IT Service provider that is using Sinch/Vitelity SIP Services (our upstream provider) to land calls into a 3cx PBX for our customers directly all of which are located regionally only. These customers are dually vetted as local SME businesses with whom we have personal working relationships with and are fully integral in their business and practices (ie: we see everything they do). We do not accept customers that are operating robo dialers, collections agencies, unscrupulous in nature, operate outbound call centers, do any kind of outbound sales or cold calling or have high call volume of any kind.

Our customers generally do not originate high volume calls. Therefore, we do not consider our customer base to profile as “high risk” of originating illegal robocalls.

As policy and since we control all admin functionality of each and every soft pbx instance we sell subscriptions to, we do not allow caller ID spoofing even if it were to be a legitimate purpose.

We also assign CNAM CID matching the businesses name to every SID and DID that the customer uses in the soft pbx.

As a step further we configure our soft pbx’s to not allow any non-us based calls in or out (terminated) using a geographic based blocking system that is built into the soft pbx.

Originating Traffic Monitoring

Flex Technology further monitors traffic to and from its customers soft pbx’s to identify potentially unlawful call origination activity. Currently this process is done manually by hand by pulling call log reports and reviewing the data in the logs.

This is a fully managed service to provide real-time reputation scoring and analytics to fight both originating and terminating robocalls. Appropriate action based on the reputation scoring and analytics is then conducted after review with the end customer. We also maintain CID block lists in the soft pbx’s for the purpose of blocking calls originating from invalid numbers per the FCC’s 2017 Call Blocking Order.

Flex Technology has also engaged both TransNexus to implement SIP Analytics across of IP traffic in and out of Flex technology managed soft pbx’s as well as a formalized plan for migration into Peerless-SIP for origination and termination which we expect to complete by the end of 2024.

Robocall Mitigation Database Any prior Robocall Mitigation Plan certifications made by Flex Technology Group have not been removed by Commission Actions and the company has not been prohibited from filing in the RMD.