

Robocall Mitigation Program Description

Morris Communications – FRN 0031450851

Overview

Morris Communications legally operating as Joshua Morris d/b/a Morris Communications, provides fully managed hosted PBX services to end-user customers. The filer also operates under the trade name 'VoxLynk,' which is not a separate entity but an alternate DBA of Joshua Morris. All customer endpoints are provisioned, managed, and authenticated by Morris Communications. Customers do not have access to the PBX administrative interface, and only approved SIP devices registered to known customers are permitted to originate or receive calls.

STIR/SHAKEN Status

Morris Communications does not perform direct STIR/SHAKEN call authentication. Instead, all outbound PSTN calls are routed exclusively through our upstream SIP trunking provider, VoIP Innovations, LLC (Sangoma), which performs STIR/SHAKEN call authentication and signing on our behalf. This arrangement ensures that all outbound traffic from our network is subject to STIR/SHAKEN compliance, even though *Morris Communications* itself does not directly implement the authentication framework.

Mitigation Measures

Morris Communications employs the following mitigation practices to prevent the origination of illegal robocalls:

1. **Restricted Access:** Only authenticated, registered SIP devices are permitted to connect to the hosted PBX system.
2. **No Automated Dialing:** Automated dialers, bots, or third-party SIP applications are not permitted on our network. All calls are originated by individual end users physically dialing from provisioned devices.
3. **Traffic Monitoring:** Call records and traffic patterns are monitored to detect and block suspicious or high-volume call activity inconsistent with typical end-user behavior.
4. **Traceback Cooperation:** *Morris Communications* responds fully and promptly (within 24 hours) to traceback requests from the FCC, law enforcement, and the industry traceback consortium.

Principals, Affiliates, Subsidiaries, and Parent Companies

Morris Communications is solely owned and operated by Joshua Morris as a sole proprietorship. The filer has no affiliates, subsidiaries, or parent companies. The filer also occasionally operates under the trade name 'VoxLynk,' which is not a separate entity but an alternate DBA of Joshua Morris d/b/a Morris Communications.

Know Your Customer (KYC) Plan

Scope. This KYC plan applies to **all new and existing customers** of Morris Communications (d/b/a VoxLynk) that originate calls through the Company's managed hosted PBX.

A. Onboarding KYC (New Customers)

1. **Identity & Business Validation:** Collect legal name, DBA, physical address, EIN/SSN (as applicable), government-issued photo ID (for sole proprietors), and confirm active business registration (Secretary of State or equivalent).
2. **Service Use Case Declaration:** Capture intended calling use cases (e.g., person-to-person enterprise voice). **Prohibit** auto-dialers, lead-gen, or high-risk verticals (telemarketing, debt relief, lead brokering, etc.).
3. **Numbering & Right-to-Use:** Verify TN/ANI assignment or LOA/port records for all outbound CLIs; prohibit caller-ID spoofing; require accurate CNAM.
4. **Contact Consent & Compliance:** Require attestation that outbound calling complies with TCPA/state laws and that the customer maintains consent records; Company may request proof upon demand.
5. **Baseline Traffic Profile:** Define expected call volumes, ASR/ACD ranges, call duration distribution, time-of-day patterns, and geographic reach to enable anomaly detection.

B. Application to Existing Customers

1. **Retroactive KYC Sweep:** Complete KYC for all active customers within **60 days**; suspend or restrict those who fail to furnish required documentation.
2. **Annual Re-verification:** Re-verify identity and use case **annually** or upon material change (e.g., volume spike, new locations, new CLIs).
3. **Change-Triggered Review:** Any significant shift from the baseline profile triggers an immediate KYC refresh.

C. Monitoring & Analytics

1. **Carrier/Upstream Analytics:** The Company uses **VoIP Innovations (Sangoma)** trunking, including carrier-provided fraud/anomaly alerts and reputation feedback.
2. **Internal Thresholds:** Automated alerts on short-duration spikes, low ASR, rapid sequential dialing, high failure codes, unusual geography, and after-hours surges.
3. **Complaints & Labels:** Investigate call labeling/consumer complaints; require customer remediation and proof of consent where relevant.
4. **Traceback:** Respond to traceback requests **within 24 hours**; preserve and provide CDRs, SIP logs, and provisioning records.

D. Mitigation Steps (Reasonable Steps to Prevent Illegal Traffic)

1. **Immediate Containment:** Rate-limit, block suspicious CLIs, or temporarily **suspend origination** pending review.
2. **Customer Outreach & Cure:** Require explanation, documentation of consent, and remediation plan.
3. **Progressive Enforcement:** Written warning → partial suspension (selected CLIs) → full suspension → **termination** for verified abuse or failure to cure.
4. **Upstream Coordination:** Notify VoIP Innovations (Sangoma) on confirmed abuse; cooperate on network-level blocking as needed.

5. **Reporting:** Where appropriate, notify regulators or the Industry Traceback Group of confirmed unlawful activity.

E. Documentation & Training

- Maintain KYC files, baseline profiles, alerts, case notes, and enforcement actions for **minimum 24 months**.
- Train staff annually on KYC, traffic anomalies, traceback, and retention.

F. STIR/SHAKEN & Network Context

- The Company does **not** directly sign calls; **VoIP Innovations (Sangoma)** performs STIR/SHAKEN on outbound PSTN traffic.
- Only **authenticated, provisioned endpoints** may originate calls; customers have **no PBX admin access; auto-dialers/bots are prohibited**.

G. Contact & Compliance Updates

- Primary contact: **jmorris@morris-communications.com**, (909) 939-4111.
- CORES/RMD changes updated within **10 business days**.

Morris Communications does not onboard call centers, predictive dialer operations, lead generation firms, or high-volume telemarketing operations under any circumstances. Existing customers are continuously monitored for adherence to their declared use cases, and any deviation triggers immediate review under the Company's mitigation procedures. Morris Communications reserves the right to immediately suspend or terminate service to any customer found to be originating illegal robocalls or failing to comply with mitigation requirements.

Regulatory Action Disclosure (Past Two Years)

Morris Communications was the subject of a Robocall Mitigation Database removal action issued by the FCC Enforcement Bureau on August 25, 2025 (DA-25-737). This action resulted from a deficient RMD filing and failure to update required information by the February 26, 2024 deadline, compounded by the use of a defunct email domain that prevented receipt of FCC notices. The action did not involve any allegation or finding that Morris Communications originated or facilitated unlawful robocalls or spoofing. The Company was provisionally reinstated on September 5, 2025, and has since fully corrected its filing, implemented improved compliance controls, and adopted a comprehensive KYC program.

Conclusion

Through a combination of strict network controls, a comprehensive Know Your Customer (KYC) program, proactive monitoring and enforcement procedures, and reliance on upstream SIP trunking providers for STIR/SHAKEN authentication, Morris Communications ensures that only verified, lawful traffic originates on its network. The Company's mitigation measures—including customer identity and use-case verification, continuous analysis of calling behavior, rapid containment of suspicious activity, and full cooperation with traceback requests—collectively ensure that illegal robocall traffic is prevented, detected, and remediated in a timely manner.