

SpherePBX, Inc. - Robocall Mitigation Plan

Updated August 25, 2025

1. Introduction

This document outlines SpherePBX, Inc's comprehensive plan to mitigate the impact of illegal robocalls on our network. We are committed to adhering to all applicable regulations and best practices to minimize unwanted calls and protect our customers from fraud and harassment. This plan will be regularly reviewed and updated to ensure its effectiveness in addressing the evolving robocall landscape.

This robocall mitigation plan is for SpherePBX, Inc., with a mailing address of 76 N. Burling Lane, West Islip NY 11795.

SpherePBX is not a foreign voice service provider.

2. STIR/SHAKEN Implementation

SpherePBX, Inc. is fully compliant with the FCC's STIR/SHAKEN framework for call authentication and routing.

We have implemented systems to: Generate and validate digital signatures for originating calls on our network, analyze call attestation data to identify and block calls with invalid or suspicious signatures, route calls with valid signatures with higher priority to enhance call delivery for legitimate callers.

We have implemented a STIR/SHAKEN solution supplied by VoIP Innovations, Inc.

3. Know Your Customer/ Know Your Upstream Providers

a Know Your Customer: SpherePBX, Inc has a comprehensive vetting and review process for all new customers. Clients are generally small to medium sizes business. We verify business name, address, and contact information. In addition, we verify legal structure, federal employer identification number, business description and services offered, authorized representatives and their contact information, and intended use of voice services.

We periodically review customer accounts and usage patterns to identify potential red flags.

We investigate complaints related to robocalls originating from SpherePBX's network.

b Know Your Upstream Providers: We have specific provisions in our contracts with upstream providers that require them to implement robust anti-robocall measure. We require them to mandate their cooperation in investigation of suspected illegal robocall traffic. If we find an upstream provider is sending suspicious calls, we will terminate service in cases of non-compliance with antirobocall regulations.

4. Compliance History

SpherePBX Inc. has consistently adhered to all applicable Federal Communications Commission (FCC) rules and regulations pertaining to robocalls, including those related to the Telephone Consumer Protection Act (TCPA) and the Truth in Caller ID Act. In the past two years SpherePBX, Inc. has not been subject of a formal commission, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing with transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing.

No prior RMD certification has been removed by the Commission. SpherePBX, Inc. has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

The person within the Company responsible for addressing all robocall mitigation-related issues, is:

Name: Christopher Olsen

Title: Chief Technical Officer

Department: Operations

Telephone Number: (631) 720-8082

Email Address: cwolsen@SpherePBX.com

5. Traceback

SpherePBX, Inc. will respond within 24 hours to all traceback investigations initiated by the Federal Communications Commission (FCC), law enforcement, or the registered traceback consortium. We maintain detailed call records that include timestamps, originating and terminating numbers, call duration, and other relevant data. These records are crucial for identifying the source and path of suspected illegal robocalls.

The person within the Company responsible for addressing all traceback-related issues, is:

Name: Christopher Olsen

Title: Chief Technical Officer

Department: Operations

Telephone Number: (631) 720-8082

Email Address: cwolsen@SpherePBX.com