



Executive Systems, Inc. Robocall Mitigation Program Description
Compliance with TRACED Act
FRN #: 0021493549
RMD RMD0008667

Executive Systems, Inc. (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company has fully implemented STIR/SHAKEN.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company’s networks. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.





Executive Systems, Inc. has five upstream providers from which it receives voice traffic:

PayG LLC dba SkySwitch Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.com

CoreDial LLC
Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 215.297.4400
Email: cdsupport@skyswitch.com

White Label Communications LLC
PO Box 14837
Pittsburgh PA 15228
Phone: 215-987-4500
Email: Support@whitelabelcomm.com

VoIP Innovations, LLC
Other Names: VI Communication Services, VoIPStreet, INC,
One Penn Center West
Suite 400
Pittsburgh PA 15276
4123263019

ANPI, LLC
Other names: Inteliquent, Associated Network Partners, Vitelity
550 W Adams Street
Suite 900
Chicago Illinois 60661
(303) 997-2300
Support@vitelity.net

CONTINUE ON NEXT PAGE





Wildix, Inc.
175 S. Third St.
Suite 1050
Columbus OH 43215
6144841500

The Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

For any questions, please contact Nita Putnam on 804.420.9118 or NitaPutnam@esitsd.com.

Sincerely,

**Nita
Putnam**

Digitally signed by Nita Putnam
DN: cn=Nita Putnam,
o=Executive Systems, Inc., ou,
email=NitaPutnam@esitsd.com,
c=US
Date: 2024.12.11 19:18:05 -05'00'

Nita Putnam

Last Revised: 02-22-2024

