

Robocall Mitigation Program Description

Network Phone Solutions, Inc. d/b/a 845 Data

FCC Robocall Mitigation Database Filing • FRN 0031509110 • July 2026

1. Provider Identification

Network Phone Solutions, Inc. (“NPS” or the “Company”), doing business as 845 Data, is a New York corporation headquartered at [41 Clarendon Ave, Kingston, NY 12401 — confirm current address matches CORES]. NPS is a facilities-based interconnected VoIP voice service provider (FCC Registration Number 0031509110) serving business customers in New York’s Hudson Valley region. NPS has registered with the Universal Service Administrative Company as an FCC Form 499 filer [Filer ID pending / _____] and [has applied for / holds] Operating Company Number [_____] from NECA.

2. Description of Services and Network

NPS provides hosted PBX and business voice services to a known base of small and mid-sized business customers. All service is delivered from Company-operated softswitch infrastructure. Calls originate exclusively from customer endpoints (IP phones and analog adapters) that are provisioned, configured, and managed by NPS technicians, and are delivered to the public switched telephone network via the Company’s direct interconnections with its underlying wholesale carriers. NPS does not offer wholesale trunking, carrier services, or resale platforms to other providers, does not lease network access to third parties, does not accept traffic originated on other networks for termination, and does not serve as an intermediate or gateway provider. One hundred percent of the traffic NPS originates is generated by its own directly contracted end-user customers on Company-managed equipment.

3. Customer Vetting (Know Your Customer)

NPS maintains direct, verified relationships with every customer authorized to originate traffic on its network. As a managed service provider, NPS typically installs and maintains the customer’s network and telephone equipment on premises, and Company personnel know each customer’s business, physical location, and personnel firsthand. Before service is activated, each customer must:

- Execute a written service agreement in the name of a verified business entity;
- Provide a verified physical service address, which NPS independently confirms in the course of on-site installation; and
- Establish billing arrangements traceable to the contracting entity.

NPS does not offer anonymous, self-service, or online sign-up. No customer can originate calls without deliberate provisioning by NPS staff. This customer profile — local businesses with ordinary, low-volume voice usage — is categorically inconsistent with high-volume outbound calling operations, and NPS does not accept call-center, auto-dialer, or bulk-calling customers [confirm, or describe any such customers and the additional controls applied].

4. Number Assignment and Caller ID Controls

All telephone numbers used on the NPS network are assigned to NPS by its underlying carriers and provisioned to specific customers by NPS. Outbound caller ID is enforced at the softswitch: each customer domain and extension is configured by NPS to present only telephone numbers assigned to that customer, and customers have no ability to set arbitrary or unassigned calling numbers. This configuration is managed exclusively by NPS administrators. As a result, calls originating on the NPS network cannot present spoofed or unauthorized caller ID.

5. Contractual Prohibitions and Enforcement

NPS's service agreements and acceptable use policy prohibit use of the service for unlawful purposes, including the origination of illegal robocalls, unlawful telemarketing, caller ID spoofing with intent to defraud, and any calling in violation of the Telephone Consumer Protection Act, the Truth in Caller ID Act, and applicable FCC rules. [Confirm current MSA/AUP language; update terms at next renewal if this language is not yet explicit.] NPS reserves and will exercise the right to suspend or terminate service, without notice where warranted, for any customer found to be originating illegal or suspicious traffic. Because NPS controls the softswitch, suspension of an offending customer's outbound calling can be effected immediately.

6. Traffic Monitoring

NPS actively monitors traffic originating on its network for indicia of illegal robocalling. Monitoring practices include:

- Review of call detail records for anomalous outbound volume, atypical calling patterns, and abnormal short-duration call ratios inconsistent with a customer's established usage profile;
- Alerting on unusual spikes in outbound call attempts at the customer and trunk level, using proprietary thresholds that are reviewed and adjusted periodically;
- International dialing disabled by default and enabled only on customer request [confirm]; and
- Investigation of any complaint, carrier notice, or traceback request associated with Company-originated traffic, with prompt remediation up to and including suspension of the originating customer.

7. STIR/SHAKEN Implementation Status

All NPS voice traffic is carried over IP end to end. NPS is in the process of implementing STIR/SHAKEN caller ID authentication in its own right and under its own certificate: the Company has registered with the FCC (FRN 0031509110), has registered as an FCC Form 499 filer, [has applied for / holds] an Operating Company Number, and is pursuing a Service Provider Code token from the STIR/SHAKEN Policy Administrator (iconectiv) and an STI certificate from an approved certification authority. Upon issuance of its certificate, NPS will sign all outbound calls at its softswitch with attestation levels determined by NPS in accordance with ATIS-1000074, and will promptly update this filing to reflect its implementation

status. Pending completion, NPS's traffic is signed upstream by its wholesale carriers, and the robocall mitigation program described herein applies to one hundred percent of the traffic NPS originates.

8. Traceback Cooperation

NPS commits to respond fully, and within 24 hours, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (currently the Industry Traceback Group administered by USTelecom), and to cooperate with such entities in investigating and stopping any illegal robocaller shown to have used its service to originate calls. Because all originating customers are known, contracted entities on Company-provisioned numbers and equipment, NPS can identify the source of any call originated on its network from its call detail records without delay.

9. Robocall Mitigation Point of Contact

Ryan Hoy / CEO, Network Phone Solutions, Inc. d/b/a 845 Data, 41 Clarendon Ave, Kingston NY 12401, 1-866-275-3715, customerservice@networkphonesolutions.com. This contact is authorized to receive and act on traceback requests and Commission correspondence. The mailbox and telephone number above are monitored during business hours, and traceback requests are handled in accordance with Section 8.

10. Certification

NPS certifies that the robocall mitigation program described above applies to all calls it originates, that the Company is taking the specific reasonable steps described herein to avoid originating illegal robocall traffic, and that it will participate fully in traceback efforts as described in Section 8. NPS has not been subject to any Commission, law enforcement, or regulatory action or investigation concerning suspected unlawful robocalling or caller ID spoofing [confirm]. This document will be updated as the Company's STIR/SHAKEN implementation progresses and whenever the information herein materially changes.

Submitted by:

Ryan Hoy / CEO

Network Phone Solutions, Inc. d/b/a 845 Data

Date: July 30th, 2026