

ROBOCALL MITIGATION PLAN

UPDATED – MAY 2026

Company Name: IP2Talk Solutions Inc

FRN: 0031562515

Address: 39 Allen St, New Hyde Park, NY 11040

Contact: Ali Asgar, husain@ip2talk.com, 9293447900

1. PURPOSE AND SCOPE

IP2Talk Solutions Inc originates voice traffic to the public switched telephone network (PSTN) and maintains a robocall mitigation program consistent with 47 CFR § 64.6305, including STIR/SHAKEN caller ID authentication implemented pursuant to 47 CFR § 64.6301.

2. PROVIDER ROLE / CALL FLOW

IP2Talk Solutions Inc provides voice services to business customers utilizing our PBX system. Calls originate from end-user endpoints registered to or interconnected with our platform and are routed to the PSTN via our upstream carrier partner, Bandwidth. We also carry and process inbound calls to numbering resources we manage and deliver those calls to customer endpoints.

3. STIR/SHAKEN STATUS

IP2Talk Solutions Inc certifies that it has implemented STIR/SHAKEN caller ID authentication across its IP network for the calls it originates, consistent with 47 CFR § 64.6301(a). Our network is IP-based for SIP calling, and we sign outbound calls we originate using our own STI certificate issued by an approved STI Certificate Authority (STI-CA). For inbound SIP calls received for termination/delivery to end users where the caller identification information has been authenticated, we verify caller identification information where technically feasible.

Attestation levels are assigned based on our verification of the calling party and confirmation of the calling party's authority to originate calls using the associated telephone number(s), consistent with applicable FCC rules, orders, and guidance.

4. ROBOCALL MITIGATION MEASURES

a. KNOW YOUR CUSTOMER PROCEDURES

We take reasonable measures to prevent new and renewing customers from using our network to originate illegal calls. All customers using our PBX platform are verified businesses.

We require business documentation, identity verification, and signed service agreements before activation. We verify customer identity and authority details, including business information, authorized representative information, and, where applicable, authorization for numbers being provisioned or ported.

We also review the customer's stated use case, expected calling activity, and requested services for consistency with the customer's business. Accounts with red flags, such as inconsistent identity details, unusually high expected volume, frequent caller ID changes, short-lived account behavior, or activity inconsistent with the stated use case, may receive additional review.

b. TRAFFIC MONITORING, ANALYTICS, AND ENFORCEMENT

We monitor call traffic using CDRs, internal system alerts, and available feedback from our carrier, Bandwidth, to detect suspicious or potentially unlawful calling activity. Monitoring may include high-volume spikes, unusual call patterns, abnormal call performance metrics, short-duration call bursts, invalid or unallocated destinations, and inconsistent or unauthorized caller ID activity.

When suspicious traffic is identified, we may investigate the activity, contact the customer, request remediation or supporting documentation, rate-limit or block affected traffic or caller IDs, suspend service, or terminate service for repeat or confirmed abuse.

c. KNOW YOUR UPSTREAM PROVIDERS

We do not accept third-party traffic for transit. Outbound calls originate only from the Provider's end users, and inbound calls are received from its upstream carrier, Bandwidth, for delivery to those end users.

We coordinate with Bandwidth on suspected illegal traffic, blocking or enforcement issues, and applicable traceback requests.

5. TRACEBACK COOPERATION AND RESPONSE

We remain committed to responding fully and within 24 hours to call traceback requests from the Commission, law enforcement, and the traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers initiating calls.

6. PRIOR INVESTIGATIONS

IP2Talk Solutions Inc., identified in the FCC order as RMD0009186 IP2talk Inc., discloses that, within the prior two years, we were subject to a formal FCC action relating to deficiencies in our Robocall Mitigation Database certification and robocall mitigation plan.

Agencies Involved:

The action involved the Federal Communications Commission's Wireline Competition Bureau and Enforcement Bureau. We are not aware of any other law enforcement or regulatory agencies involved in this matter.

Date Commenced:

The matter began after the March 29, 2024 email notification from the Robocall Mitigation Database Team, identified in the FCC order as the WCB email, stating that our RMD certification was noncompliant with section 64.6305 because we had failed to submit an updated RMD certification and updated robocall mitigation plan by the February 26, 2024 deadline. The notification required us to submit an updated certification and updated robocall mitigation plan by April 29, 2024.

The matter proceeded under File No. EB-TCD-24-00036891 after failing to timely update our RMD certification and mitigation plan. On December 10, 2024, the Enforcement Bureau issued a Show Cause Order directing us to cure the deficiencies and notify the Bureau that the deficiencies had been cured, or explain why our certification should not be removed from the RMD. The matter was later assigned File No. EB-TCD-25-00038590.

Summary of Findings:

The FCC found that our RMD certification was deficient because our robocall mitigation plan was not provided or lacked information required to be submitted by February 26, 2024, and because our certification lacked information required by that same date. The FCC also found that we failed to timely cure the deficiencies or provide a sufficient explanation after the Show Cause Order. The findings related to deficient RMD filing and mitigation-plan compliance. The FCC orders did not find that we originated illegal robocalls, engaged in spoofing, or transmitted unlawful traffic.

Final Determination:

A final determination was issued in DA 25-737, released August 25, 2025. In that Order, the Enforcement Bureau removed our certification from the RMD and stated that we could not refile in the RMD unless and until both the Wireline Competition Bureau and Enforcement Bureau consented.

Current Status:

As of May 11, 2026, we have updated our RMD filing and robocall mitigation plan to address the deficiencies identified

in the FCC action. Our current filing reflects our present robocall mitigation practices and STIR/SHAKEN implementation status. We are not aware of any additional final determination after DA 25-737 and understand that our current filing remains subject to any further FCC review, request or condition.

7. ONGOING EFFORTS AND UPDATES

IP2Talk Solutions Inc is committed to maintaining and improving its robocall mitigation practices, including:

- Updating its RMD filing and associated plan information within 10 business days when filing information changes.
- Regular review and updates to the mitigation program to address emerging threats and regulatory changes.
- Participation in industry forums and initiatives to develop best practices for combating illegal robocalls.
- Educating our consumers on how to avoid being a victim of illegal robocalls and providing a method for reporting robocall-related concerns.