

Robocall Mitigation Program Description

CyberAnnex Corp.

FCC Registration Number (FRN): 0031472830

Robocall Mitigation Practices for Small Provider

CyberAnnex qualifies as a **small voice service provider** under the FCC's rules and has not yet fully implemented the STIR/SHAKEN caller ID authentication framework due to the presence of legacy TDM or non-IP facilities. In accordance with **47 CFR § 64.6305(b)**, we have adopted a robocall mitigation program to prevent the origination of illegal robocalls on our network.

Our mitigation plan includes the following key components:

1. **Know-Your-Customer (KYC) Protocols**

We perform thorough customer vetting prior to service activation, including:

- Verification of business registration and identity documents
- Review of service use cases
- Ongoing monitoring of high-volume customers

2. **Traffic Monitoring and Analytics**

We use internal traffic analysis tools to monitor outbound calls and identify anomalies indicative of robocall behavior, such as:

- Unusual call volumes or spikes
- High short-duration call ratios
- Irregular calling patterns (e.g., simultaneous calls to large blocks of numbers)

3. **Traceback Cooperation**

We promptly respond to all traceback requests from the **Industry Traceback Group (ITG)**, the **FCC**, and law enforcement. We retain sufficient call data to trace back the source of suspicious calls and, when necessary, take immediate action to suspend or terminate the customer responsible.

4. **Mitigation Measures**

For any suspected illegal robocall activity, we take the following steps:

- Immediate investigation and traffic review
- Suspension or restriction of services pending resolution
- Permanent disconnection for confirmed violations

5. **Progress Toward STIR/SHAKEN**

We are actively working to upgrade our network toward full IP connectivity and STIR/SHAKEN implementation. We are also coordinating with upstream providers to sign calls on our behalf when technically feasible.

Confidential Treatment Request

Pursuant to **47 CFR § 0.459**, CyberAnnex has submitted a request for **confidential treatment** of sensitive information included in this filing via the **Electronic Comment Filing System (ECFS)**. This request covers proprietary business practices, network security measures, and customer monitoring protocols to ensure the integrity and confidentiality of our mitigation efforts.