

Ajoxi Limited

Robocall Mitigation Plan

Executive Summary

Ajoxi Limited, as a foreign voice service provider with an Operating Company Number (OCN) license, complies fully by filing initial and ongoing certifications. Ajoxi Limited is dedicated to preventing illegal calls from originating on our network and monitoring inbound traffic. We leverage our affiliate Ymax's infrastructure, which features full STIR/SHAKEN implementation, to enhance mitigation efforts. This plan details our multi-layered approach to robocall prevention, incorporating risk-based controls and full cooperation in traceback activities.

Company Purpose and Role

Ajoxi Limited operates as a foreign voice service provider, delivering VoIP services and carrying or processing calls utilizing North American Numbering Plan (NANP) resources. We are committed to stopping illegal calls at their source while ensuring legitimate communications remain uninterrupted. As a non-gateway intermediate provider with STIR/SHAKEN compliance and an OCN license, we focus on robust upstream and downstream vetting to maintain network integrity.

Governance and Compliance Structure

- **Zero-Tolerance Policy:** Ajoxi Limited enforces a strict policy against illegal robocalling, spoofing, and abusive practices.
- **Compliance Officer Responsibilities:** A designated officer oversees RMD filings, customer onboarding, traceback coordination, and quarterly reviews. Policies are documented, annually audited, and updated per regulatory changes.

Customer and customer Vetting (Know Your Customer)

The accurate identification of customers in the STIR/SHAKEN ecosystem ties to telephone number-based caller identities. A customer is an entity with a business relationship where Ajoxi Limited sends calls on their behalf.

- **Verification Process:** All new customers undergo identity confirmation, including name, email address validation, and location verification. Submissions are cross-checked against databases.
- **Risk Classification:** Customers are categorized as Low, Medium, or High Risk based on traffic profiles, reseller status, and exposure. High-risk entities require enhanced due diligence and management approval.

- **Ongoing Monitoring:** Renewing customers face annual re-verification to ensure compliance.

Customer Agreements and Terms of Service

All customers must agree to Ajoxi Limited's Terms of Service (TOS) prior to activation. Key prohibitions include:

- Providing altered, deceptive, or false information about sender identity or call origin.
- Engaging in "autodialing" and/or "telemarketing" without consent.
- Violations trigger immediate suspension or termination, with mandatory reporting of suspected issues.

Network Monitoring and Traffic Controls

Our systems are configured for active oversight:

- **Blocking Mechanisms:** Invalid ANI is blocked; spoofed or unallocated caller IDs are rejected in real time.
- **Daily Analytics:** Potential spam indicators are monitored, with flagged ANIs blocked promptly.
- **Pattern Detection:** Real-time analysis identifies anomalies like sudden spikes, short-duration calls, or sequential dialing. Alerts prompt investigations and dynamic blocking.
- **DNC Enforcement:** Network-wide integration prevents calls to registered Do Not Call numbers.

STIR/SHAKEN Implementation

Ajoxi Limited has fully implemented the STIR/SHAKEN caller ID authentication framework across IP portions of its network, leveraging our OCN license and affiliate infrastructure. We certify compliance under 47 CFR §§ 64.6301–64.6302, authenticating SIP calls and applying equivalent measures (e.g., caller ID validation, analytics filtering) for non-IP segments. Registration with the STIR/SHAKEN Policy Administrator includes an SPC token and certificate generation. All attestations are made internally, ensuring standardized authentication (STIR – RFC 8224/8225/8226; SHAKEN – ATIS-1000074-E/1000080/1000082).

Traceback and Enforcement Cooperation

- **Response Protocol:** All traceback requests from the FCC, U.S. Telecom, law enforcement, or authorized entities are resolved within 24 hours.
- **Investigation Process:** We suspend suspected accounts during reviews, terminate confirmed violators, and provide data/technical assistance.
- **User Feedback:** Mechanisms encourage reporting of suspicious calls, with prompt investigations and actions.

Continuous Improvement and Training

- Staff receive regular training on FCC regulations and prevention techniques.
- Customers are educated on compliance obligations to foster responsible usage.
- Audits ensure program effectiveness, with updates within 10 business days of material changes.

This plan supersedes prior versions and aligns with current FCC requirements. For inquiries, contact our Compliance Officer.

Prepared for Ajoxi Limited

Signature

Alizah Z

Compliance Officer