



## **Robocall Mitigation Plan**

This Robocall Mitigation Plan is submitted by IParigon, LLC, pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC), which require all “voice service providers” to establish and file a robocall mitigation plan. This document sets forth IParigon’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating through its services. The Provider views these measures as constituting “reasonable steps” to prevent illegal traffic. In addition, the provider commits to responding promptly to all traceback requests from the FCC, and law enforcement, and to actively assisting in the identification and prevention of illegal robocall activity using its services.

### **I. STIR/SHAKEN Implementation Status**

IParigon is a pure reseller and does not own or operate network facilities directly. However, through its upstream provider, Telnyx is able to support STIR/SHAKEN authentication and provide attestation levels on outbound calls. The Provider relies on its upstream carrier’s implementation of STIR/SHAKEN to ensure that calls are authenticated and signed in accordance with FCC requirements.

Calls are assigned attestation levels according to industry standards. Full attestation (A) is applied when IParigon has a direct relationship with the customer, has verified their identity, and has confirmed their right to use the calling number. Partial attestation (B) is applied when IParigon has verified the customer but cannot confirm their right to use the specific number. Gateway attestation (C) is applied when IParigon can authenticate only the point of entry into its network but cannot authenticate the customer or the calling number.

Through this process, IParigon, working in cooperation with its upstream provider, ensures that all outbound traffic is authenticated and assigned an attestation level consistent with the FCC’s requirements and industry best practices.

### **II. Traceback Requests**

The Provider fully cooperates with the FCC and law enforcement on all traceback requests and investigations. Sufficient resources are dedicated to ensuring that all traceback requests are answered promptly and comprehensively, and the Provider commits to providing complete responses within 24 hours of receipt. Agreements with upstream providers include provisions requiring traceback cooperation, ensuring that all parties in the call path respond in a timely manner.

### **III. Customer Vetting Practices**

The Provider implements comprehensive “Know Your Customer” procedures designed to prevent unlawful callers from accessing its services. Prior to activation, all customers are required to provide government-issued identification or business registration documents, federal tax identification numbers, and the nature of their business or service use case. Customers must also disclose expected calling volumes and traffic patterns, which are reviewed for reasonableness. Commercial customers, particularly those with high call volumes, are subject to enhanced due diligence, which may include background checks or additional documentation review.

All customers agree to Acceptable Use Policies and service agreements that explicitly prohibit the origination of illegal robocalls and reserve the Provider’s right to suspend or terminate service for violations. Ongoing monitoring is conducted through review of call detail records (CDRs) provided or supported by the upstream carrier, enabling the Provider to identify irregular or suspicious calling patterns. Customers whose traffic suggests unlawful behavior are contacted within twenty-four hours and investigated, with service suspension or termination imposed if necessary.

### **IV. Telephone Number Validation Practices**

The Provider validates that customers use only authorized telephone numbers. Subscribers are permitted to use only numbers assigned directly by the Provider or obtained through a validated upstream partner. The Provider works with its upstream carriers to ensure that outbound calls present caller ID information consistent with the numbers legitimately assigned to each customer. This practice helps ensure that caller ID numbers are accurate, authorized, and traceable.

### **V. Know Your Upstream Provider Procedures**

IParigon takes an active role in robocall mitigation by coordinating with its upstream providers and ensuring that upstream partners apply the same high standards of compliance. The Provider maintains relationships only with upstream carriers that have filed robocall mitigation certifications with the FCC and demonstrated compliance with STIR/SHAKEN and related obligations. The Provider reviews public filings and industry records to confirm their compliance and includes contract language requiring cooperation in monitoring, traceback, and mitigation of illegal robocalls.

### **VI. Ongoing Robocall Mitigation Practices**

The Provider continues to monitor customer traffic and review available call detail records for evidence of suspicious activity. In the event that unusual calling patterns are detected,

such as high call volumes, bursts of traffic in short intervals, sequential dialing, or calls to unallocated numbers, the Provider promptly investigates and, if necessary, suspends or terminates customer accounts. The Provider also cooperates with its upstream providers, the FCC and law enforcement in investigating and preventing unlawful robocalls.

## **VII. Certification**

The Provider certifies that it has implemented and continues to maintain the robocall mitigation practices described in this plan, and that it will continue to take reasonable steps to avoid the origination of illegal robocall traffic in compliance with 47 C.F.R. § 64.6305.

### **Signed:**

Jill Munsterman  
President,  
IParigon  
September 11, 2025

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## **Appendix A**

### **Traceback Request Single Point of Contact**

**Name:** Chris Wilson  
**Title:** Lead Network Engineer  
**Phone Number:** 930-212-9100  
**Email Address:** chris@iparigon.com

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### **Upstream Provider Information**

Name of Upstream Provider: Telnyx, LLC  
Nature of Business: Wholesale VoIP Carrier  
Network Location: U.S.-based  
Contact Name: Mark Morse  
Title: Director of Customer Success  
Phone Number: 512-737-7691  
Email Address: mark@telnyx.com