

Robocall Mitigation Plan

Submitted to: Federal Communications Commission (FCC)

Prepared by: FoneLogix, LLC

Date: 08/26/2025

1. Company Information

- **Company Name:** FoneLogix, LLC
- **FCC Registration Number (FRN):** 0026471375
- **Company Address:** 490 Sun Valley Drive, Roswell, GA 30076
- **Responsible Officer:** Mitchell Bridges, EVP/Co-Owner, mbridges@fonelogix.com, 678-571-5118
- **24/7 Contact for Robocall Issues:** Mitchell Bridges, mbridges@fonelogix.com, 678-571-5118

2. STIR/SHAKEN Implementation Status

Please check one:

- ☐ Fully implemented STIR/SHAKEN in IP portions of network
- ☐ Partial implementation due to non-IP network elements
- ☐ Not capable of STIR/SHAKEN (non-IP network only)

Details of Implementation or Justification (if applicable):

We have STIR/SHAKEN functionality, but it is not turned to Bandwidth today. The reason for that is that we were told STIR/SHAKEN is provided through Bandwidth, we don't need to turn it on to them. All calls incoming and outgoing are passing through Bandwidth only, there is no other carrier on that portion of the business.

For the second portion of our business traffic goes through the coreDial platform, we do not have any control over their system, they are taken care of all compliance.

3. Robocall Mitigation Program

We have implemented the following robocall mitigation practices:

a. Call Traffic Monitoring

We actively monitor and analyze call traffic patterns to detect:

- High-volume short-duration calls
- Repetitive calls to sequential or randomized numbers
- High answer-to-seizure ratio (ASR) anomalies

Suspicious call traffic is flagged for review and, when necessary, blocked or reported.

b. Know Your Customer (KYC) Protocols

Before onboarding a customer, we perform a thorough vetting process including:

- Identity verification (government-issued ID or EIN)
- Nature of business inquiry
- Customer call pattern expectations
- Prohibited use clause in terms of service
- Request traffic history, if available to have it vetted by FoneLogix and Bandwidth.

Ongoing audits are conducted to ensure continued compliance.

c. Call Blocking and Labeling

We employ analytics-based and manual review to block:

- Calls from invalid, unassigned, or spoofed numbers
- Known robocall signatures

We label potential scam calls for consumer awareness.

d. Traceback Cooperation

We cooperate fully with the Industry Traceback Group (ITG) and promptly respond to traceback requests to identify the source of illegal robocalls.

e. Complaint Handling

We have a designated team to handle consumer complaints. Complaints are investigated within 48 hours. If malicious activity is confirmed, service is suspended or terminated.

4. Certification and Enforcement

- All mitigation policies are enforced under FoneLogix's service agreement.

- Violations may result in suspension or termination.
 - Our mitigation policies are reviewed quarterly and updated as needed.
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5. Additional Measures (Optional)

- Per-client settings limiting amount of traffic allowed
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6. Attestation

I, the undersigned, certify that the above-described Robocall Mitigation Plan is true and correct, and that FoneLogix has implemented it in good faith to prevent the origination of illegal robocalls.

Signature: _____

Name: Mitchell Bridges

Title: EVP & Co-Owner

Date: 08/26/2025