

Panurgy NY Metro, LLC Robocall Mitigation Compliance with TRACED Act

Panurgy NY Metro, LLC, d/b/a/ Panurgy (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), lawenforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company has fully implemented STIR/SHAKEN.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company carefully vets all customers, meeting them in person, performing credit checks, and in almost 100% of cases, has existing relationships, providing other IT Managed Services to clients, prior to providing them with VoIP/calling services.

The Company is a reseller of CoreDial/Skyswitch services, where the network provider and operator is CoreDial/Skyswitch. The Company does not provide/operate the network, and thus does not use data systems for analytics in the implementation of STIR/SHAKEN. It is possible that the actual network provider whose services we are reselling - CoreDial/Skyswitch, does use such systems but we do not have direct knowledge or details of such use.

The Company has been informed that the network operator - CoreDial/Skyswitch - utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. and utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks.

The Company has two upstream providers from which it receives voice traffic:

1. PayG LLC dba SkySwitch
Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.com

2. CoreDial LLC
Arborcrest 1, 751 Arbor Way
Suite 150
Blue Bell, PA 19422
Phone: 215.297.4400
Email: cdsupport@skyswitch.com

The Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.