

Amendment to Robocall Mitigation Database (RMD) Filing

Filing Entity: FitComm Group LLC (RMD0017347) **Date of Amendment:** 9/3/2025

This document serves as an amendment to the original Robocall Mitigation Database (RMD) filing for FitComm Group LLC. This amendment is being submitted to address the deficiencies noted in the recent correspondence from the Federal Communications Commission (FCC).

Section I: Robocall Mitigation Plan (Original Text)

The following is the original text of the Robocall Mitigation Plan submitted by FitComm LLC dba HelloGym/Vosseo/GymPhone:

FitComm LLC dba HelloGym/Vosseo/GymPhone (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, 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 utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and thirdparty solutions to detect invalid phone number formats, area codes and unassigned number blocks.

The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles. The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company’s networks. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

FitComm LLC dba HelloGym/Vosseo/GymPhone has three upstream providers from which 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
3. Twilio Inc 548 Market St #14510 San Francisco, CA 94104 Email: support@twilio.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.

Section II: Additional Information (Addressing FCC Deficiencies)

This section provides the information required by the FCC's deficiency letter.

Deficiency A: Principals and Affiliates

Pursuant to paragraph 46 of the *Sixth Caller ID Authentication Report and Order* (FCC 23-18), the following information is provided regarding the principals, affiliates, and parent companies of Fitcomm Group LLC.

- **Principal(s) Exercising Management or Control:**
 - Todd Huna, Founder, todd@hellogym.io, 612-502-0021
 - Chad Capp, Founder, chad@hellogym.io, 612-502-0020
- **Parent Company:**
 - None
- **Subsidiaries or Affiliates:**
 - Vosseo, 200 Central Ave, Osseo, MN 55369
 - HelloGym, 200 Central Ave, Osseo, MN 55369

Deficiency B: Third-Party Analytics Vendors

As required by 47 CFR § 64.6305(d)(2)(ii), the names of the third-party analytics vendors used by Fitcomm Group LLC are as follows:

- Twilio
- SkySwitch

Conclusion

Fitcomm Group LLC affirms that the information provided in this amendment is true and accurate to the best of its knowledge and belief.