

ROBOCALL MITIGATION PLAN

Comexcel Technologies is a systems integrator and reseller of both hosted voice applications and voice trunking services. As a downstream provider Comexcel Technologies does not implement the STIR /SHAKEN protocols directly. Comexcel Technologies is a switchless reseller and does not authenticate calls as we rely on and benefit from our upstream providers who are in compliance with the FCC's STIR/SHAKEN requirements.

We use software provided by Bandwidth.com to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls.

TRACED Act

Comexcel Technologies will comply with the TRACED Act (Telephone Robocall Abuse Criminal Enforcement and Deterrence" Act) and is committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (Industry Traceback Group (ITG) designated as the FCC's enforcement bureau as the single registered consortium to lead and conduct private-led traceback efforts), and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. Appropriate action will be taken to respond to any identified robocall violations including but are not limited to the discontinuation of service to the offender(s) on Comexcel Technologies network.

STIR / SHAKEN Exemptions

Pursuant to 47 CFR § 64.6304, "small voice service providers" are exempt from the requirements of 47 CFR § 64.6301 (Caller ID authentication requirements for voice service providers) through June 30, 2023. Comexcel Technologies currently meets the definition of a small voice service provider with less than 100,000 voice service subscriber lines.