

Robocall Mitigation Program Description

Company Name: Xunity Inc.

Date: May 24th, 2024

Section 1: Introduction

Purpose: This document outlines the robocall mitigation program for Xunity Inc. to comply with FCC requirements and prevent illegal robocall traffic.

Scope: The program covers all call traffic managed by Xunity Inc., focusing on our integration with our upstream provider's STIR/SHAKEN implementation.

Section 2: Rule and Exemption Explanation

Rule Reference: 47 CFR § 64.6305(a)

Exemption Justification:

- Xunity Inc. is based in Canada and primarily serves Canadian clients.
- Our upstream provider (Skyetel), which is based in the USA, has fully implemented the STIR/SHAKEN framework.
- We have enabled STIR/SHAKEN within our management interface to leverage our provider's implementation.
- Our company uses Asterisk servers to manage calls for our end-user clients, which currently do not fully support STIR/SHAKEN natively.
- We have taken reasonable steps to ensure that our call traffic is monitored and compliant with robocall mitigation standards.

Section 3: Robocall Mitigation Measures

Call Authentication:

- Xunity Inc. utilizes the STIR/SHAKEN capabilities provided by our upstream provider.
- We have configured our management interface to support call authentication.

Traffic Monitoring:

- We regularly monitor call patterns and traffic for anomalies indicative of illegal robocalls.
- Our system flags high call volumes with short durations and sequential dialing patterns for further investigation.

Caller ID Management:

- We ensure accurate caller ID information is passed through our network by validating caller IDs against known databases.
- Calls with invalid, unallocated, or spoofed caller IDs are blocked or flagged for review.

Customer Vetting:

- Xunity Inc. conducts Know Your Customer (KYC) checks to verify the identity and legitimacy of new customers.
- We maintain records of customer identification and verification to prevent misuse of our services.

Complaint Handling:

- We have a system in place to receive and address complaints regarding potential illegal robocalls.
- Complaints are investigated promptly, and necessary actions are taken to prevent recurrence.

Cooperation with Authorities:

- Xunity Inc. commits to responding fully and within 24 hours to traceback requests from the FCC, law enforcement, and the industry traceback consortium.
- We cooperate with these entities to investigate and stop illegal robocallers using our services.

Education and Awareness:

- We educate our customers on the importance of complying with legal requirements and the impact of illegal robocalls.
- Xunity Inc. provides resources and guidelines to help customers avoid unintentional involvement in robocall activities.

Regular Updates and Reviews:

- Our robocall mitigation program is reviewed and updated regularly to ensure ongoing effectiveness and compliance.
- We conduct periodic audits to assess the program's performance and identify areas for improvement.

Section 4: Confidentiality Request

Confidential Information:

- Xunity Inc. requests that specific sections of this document, particularly those detailing internal processes and customer information, be kept confidential due to their sensitive nature.

ECFS Filing:

- A formal request for confidentiality has been filed in the Electronic Comment Filing System (ECFS) to protect our proprietary information.

Section 5: Conclusion

Summary: Xunity Inc. is committed to preventing illegal robocalls and ensuring compliance with FCC regulations. We have implemented robust measures and leverage our upstream provider's STIR/SHAKEN capabilities to maintain a secure and trustworthy communication environment for our clients.