

1. Program Scope

This Program applies to X.Communications Ltd., a Voice service provider. The Program addresses all aspects of our operations related to originating, carrying, and processing voice traffic.

2. Illegal Robocall Mitigation Strategies

2.1 Origination

- **Subscriber Vetting:** We implement a robust vetting process for new customers, including verification of identity, business legitimacy (if applicable), and intended use of our services.
- **Anti-Fraud Measures:** We employ automated systems and manual reviews to identify and block suspicious call patterns associated with robocall campaigns.

2.2 Carrying and Processing

- **Traffic Filtering:** We implement robust call filtering mechanisms to identify and block calls with characteristics associated with illegal robocalls, such as high call volume from unregistered numbers.
- **Robocall Detection Tools:** We utilize custom robocall detection tools within our SBC's that analyze call patterns, identify and block unwanted robocalls.
- **Blacklist Management:** We maintain and actively update blacklists of known robocallers to prevent their calls from reaching our network.

3. Traceback Cooperation

We are committed to cooperating fully with traceback requests from the FCC, law enforcement agencies, and the industry traceback consortium. We will respond to all such requests within 24 hours and provide any necessary information to assist in identifying and stopping illegal robocallers.

4. Program Review and Improvement

We will periodically review and assess the effectiveness of this Program. We will consider industry best practices, new technologies, and evolving robocall threats to ensure our Program remains effective. We reserve the right to modify and update this Program as needed.

5. Certification

We certify that this Program includes reasonable steps to avoid originating, carrying, or processing illegal robocall traffic, as required by 47 CFR § 64.6305.



Recoverable Signature

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Kenneth B. Mc Cleft

Signed by: 22479ba9-05ae-41ef-8571-8c8fc9a42bb3