



Date: August 27, 2025

Subject: Robocall Mitigation Statement & Option 3 ("No STIR/SHAKEN Implementation")
Certification

To Whom It May Concern,

Openfax (Opfx, Inc., d/b/a Openfax) operates as a pure reseller of telecommunications services. We do not control the network infrastructure required to implement STIR/SHAKEN (e.g., SBCs/signing infrastructure), and we do not determine attestation levels. Accordingly, in the FCC Robocall Mitigation Database we certify **Option 3: No STIR/SHAKEN Implementation**, pursuant to **47 C.F.R. § 64.6305(d)(2)(i)**.

All outbound calls originated for our customers **egress exclusively via our upstream carrier(s), currently Telnyx**. Our upstream provider **authenticates and signs** calls **using its own STI-CA certificate** and assigns **A/B/C attestation**. Openfax does **not** implement STIR/SHAKEN on any portion of our network.

Robocall Mitigation Program (47 C.F.R. § 64.6305(c))

Openfax maintains and enforces a robocall mitigation program that includes:

1. **Customer vetting/KYC** prior to activation (business identity, authorized users, intended use).
2. **Numbering controls** (we provision numbers from upstream providers; no snowshoeing or randomized ANI).
3. **Traffic monitoring & anomaly blocking** (rate/volume thresholds, high-risk destinations, complaint triggers).
4. **Enforcement** (immediate suspension/termination for ToS violations or illegal traffic).
5. **Traceback cooperation** — We **commit to respond fully within 24 hours** to traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate to stop any illegal robocallers that may use our service.

24x7 Traceback Contact:

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Openfax itself does not issue attestation but relies on its carrier partner (Telnyx) for SHAKEN/STIR compliance. That makes the scope crystal clear and limits exposure.

We will keep this certification and our mitigation plan **current** and update our RMD filing within the required time if any material information changes.

Sincerely,

Brett Kokinadis

President, Opfx, Inc. (Openfax)