



To Whom It May Concern,

My Xcell Network hereby submits this RoboCall Mitigation Plan pursuant to the requirements set forth in 47 C.F.R. §§ 64.6303-6305.

My Xcell Network, nor any of our executives or principals have a history of enforcement actions for illegal robocalls, TCPA or TSR violations. We have not been prohibited from filing a certification in the Robocall Mitigation Database.

We have a direct customer relationships with all entities that use our network:

- Myxcell network is a small provider and provides a complete hosted VoIP setup of PBX phone system, and Fax Provider to our customers. Hosted on cloud services procured by My Xcell Network. We have an intimate knowledge of each customer's setup and it would be difficult and extremely unlikely for any of our customers to use any robocall device or software on top of our services.
- My Xcell Network collects physical business location, contact person (s) and nature of the company's business. The physical location is verified during the service installation process
- My Xcell Network does not sell services to international call originators.
- My Xcell Network does not sell wholesale services
- My Xcell Network works with tier 1 carriers only that have fully implemented STIR/SHAKEN solutions for VoIP providers

Commitment to Responding to Traceback Request

My Xcell Network commits to respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls, and that none of the voice traffic that originates on its network is authenticated with STIR/SHAKEN, as we rely this in our upstream providers that has STIR/SHAKEN compliance, and that all of the voice traffic that originates on its network is subject to a robocall mitigation program.



Traceback Request Single Point of Contact:

- Name: Luis Eduardo Gonzalez
- Title: CEO
- Phone Number: 305-704-0521 Ext 220
- Email Address: admin@myxcell.net

Upstream Provider Information:

Name of Upstream Provider: SkyeTel

Nature of Business: VoIP Provider; Wholesale Long-Distance

Provider Network Location of Upstream Provider: 915 Broadway St #100, Vancouver, WA, 98660

Phone Number: 360-986-5200

Website: www.skyetel.com

Call Analytics Vendors Names and Description of Systems:

Name of Vendor: Skyetel

My Xcell Network utilizes Skyetel platform to support the effectiveness of its Robocall Mitigation Plan. This includes, as examples, the use of “Telecom Fraud Prevention” and “Robocall and Telephone Denial of Service (TDos) Prevention” services, which include more specifically the use of the following methods/tools as a means of preventing and blocking fraudulent and illegal robocalls on its network: the use of CDRs and related reports for determining mitigation actions; use of SIP Analytics enabling real time traffic analysis and detection and mitigation of robocalls at origination; use of blacklisting and whitelisting to mitigate calls with specific attributes; use of CAPTCHA gateway services to distinguish whether calls are from humans or autodialers; use of a “Shield” database that screens calls at origination for calling numbers that are invalid, high-risk, or appear on “Do Not Originate” lists; and use of reputation look up services on calling numbers at origination.



QuestBlue Systems, Inc

Is actively engaged in the following Robocall Mitigation Methods.

BLACKLISTS

- Calling telephone number or prefixes
- Calling SPIDs (OCNs) that are not yours
- Calling Locations states/provinces/regions that are not identified by the client as locations.
- Improper ANI
- IP Addresses that are identified as robo callers
- Monitoring user agents that are used by robo callers.

When a call is identified by a blacklisted attribute, we will block the call.

Utilizing Reputation Scoring on traffic

- Constantly monitoring traffic for bad reputation

Low ASR and ALOC

- Monitoring systems in place for immediate lookup of clients activity and statistics.

CDR Analysis

- We are constantly engaged with CDR monitoring for identifiable markers on bad traffic.
- Fully implemented on STIR/SHAKEN