

Robocall Mitigation Plan

Introduction

Telnextrix LLC, a leading wholesale VoIP provider, is dedicated to delivering secure and reliable voice communication services. This Robocall Mitigation Plan outlines the proactive measures Telnextrix LLC has implemented to identify, mitigate, and prevent unlawful robocalls from utilizing its network, in full compliance with FCC regulations and industry best practices.

Core Principles

- 1. Fraud Prevention and Detection:** Identify and prevent unlawful robocalls to protect customers and the telecommunications ecosystem.
 - 2. Regulatory Compliance:** Adhere to FCC requirements, including STIR/SHAKEN implementation, traceback participation, and Do Not Originate (DNO) policies.
 - 3. Customer and Provider Verification:** Enforce robust Know Your Customer (KYC) and Know Your Provider (KYP) policies to ensure only legitimate traffic traverses the network.
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Mitigation Strategies

- 1. STIR/SHAKEN Implementation:**
 - Deploy fully integrated STIR/SHAKEN caller ID authentication to verify the legitimacy of calls and combat spoofing.
 - Utilize certificates issued by the Secure Telephone Identity Policy Administrator (STI-PA) to validate calls.
- 2. Network Monitoring and Analytics:**
 - Employ advanced analytics to monitor call patterns, detect anomalies, and identify potential robocall activity.
 - Integrate trusted third-party analytics tools to block calls from numbers flagged as spam or fraudulent sources.
- 3. Traceback Collaboration:**

- **Designate a 24-hour response contact for handling traceback requests.**
- **Actively support the Industry Traceback Group (ITG) and law enforcement in identifying and addressing the sources of illegal robocalls.**

4. Do Not Originate (DNO) Protocols:

- **Block calls originating from numbers on the DNO registry, in compliance with FCC regulations.**
- **Regularly update and align DNO records to ensure comprehensive blocking.**

5. Customer Onboarding and KYC Procedures:

- **Require all new customers to provide verifiable proof of number ownership, business documentation, and references.**
- **Conduct interoperation tests with potential customers to validate traffic legitimacy before onboarding.**

6. Fraudulent Traffic Mitigation:

- **Monitor traffic for irregular patterns, such as spikes in high-cost traffic, and act swiftly to mitigate risks.**
- **Block, trace, and report any suspected fraudulent or abusive call traffic.**

7. Call Blocking and Reporting:

- **Use SIP response codes and maintain blacklists to block identified fraudulent or illegal calls.**
- **Notify customers of irregularities and require immediate remediation of suspicious traffic.**

Ongoing Commitment

1. Continuous Improvement:

- **Regularly update mitigation tools and practices to stay ahead of evolving robocall threats.**

- Engage in industry initiatives to remain informed about emerging risks and best practices.

2. Customer Education and Support:

- Provide resources to help customers avoid involvement in unlawful robocall schemes.
- Offer tools and guidance to assist customers in complying with federal Do Not Call (DNC) regulations.

3. Compliance Assurance:

- Periodically audit internal processes and customer traffic to ensure full adherence to FCC standards.
- Enforce strict policies with consequences such as account suspension or termination for non-compliance.

Contact Information

For inquiries related to robocall mitigation, please contact:

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Certification

I, as an authorized representative of Telnextrix LLC, certify under penalty of perjury that Telnextrix LLC has implemented this Robocall Mitigation Plan in compliance with FCC regulations.

Paul McAfee

Title: CTO

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