

Xobee Networks LLC

ROBOCALL MITIGATION PLAN

Xobee Networks LLC is committed to cooperating with the Federal Communications Commission (FCC) in preventing and mitigating illegal robocalls. This statement describes the measures the Company has implemented to comply with applicable FCC robocall mitigation requirements.

Xobee Networks LLC operates as an intermediate provider under its assigned Operating Company Number (OCN) 460L and complies with the robocall mitigation requirements of the FCC pursuant to 47 C.F.R. §§64.6303 and 64.6305, including STIR/SHAKEN authentication and traceback obligations as reflected in the FCC Robocall Mitigation Database filing requirements.

In compliance with 47 CFR §64.6305, **Xobee Networks LLC** maintains a robocall mitigation program reasonably designed to prevent unlawful robocalls. The program includes customer due diligence procedures, monitoring of traffic patterns, prompt response to traceback requests, and suspension or termination of customers engaged in illegal robocalling.

Know Your Customer (KYC)

The Company follows a structured onboarding process to verify the identity and legitimacy of its customers. This process includes background screening, credit review, business verification, and manual validation procedures prior to activating service.

Traceback Cooperation

The Company commits to fully cooperating with the FCC, authorized traceback consortiums, and law enforcement agencies. The Company responds to all traceback requests within 24 hours and takes appropriate action to investigate and mitigate any suspected illegal traffic.

STIR/SHAKEN Compliance

Xobee Networks LLC utilizes the “ClearIP” solution provided by TransNexus to support STIR/SHAKEN authentication and call analytics functions. The Company maintains its own

Service Provider Code (SPC) token and digital certificate and signs outbound calls in the IP portions of its network using its authorized authentication credentials. The Company retains full regulatory responsibility for STIR/SHAKEN implementation, attestation level assignment, certificate management, and compliance with applicable FCC rules.

The ClearIP solution performs STIR/SHAKEN validation, caller reputation scoring, and attestation observation.

Third-Party Authentication Partner:

1. Name: Trans Nexus Clear IP
Phone Number: 1-855-474-2536
Email: clearip@support.transnexus.com
Website: <https://tickets.trnsnexus.com>

Traffic Monitoring and Enforcement

The Company reserves the right to refuse or block traffic from any party where illegal robocalling, spoofing, or use of unauthorized or invalid originating numbers is detected or suspected. The Company may block originating numbers, terminating numbers, trunks, or suspend or terminate customer accounts to prevent unlawful traffic from transiting its network.

Signed

Christopher Rawn

CHRISTOPHER RAWN
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