

Redacted Version (Non-Confidential)**ROBOCALL MITIGATION PROGRAM FOR KEYCENTRIX, LLC**

Submitted to the FCC Robocall Mitigation Database, March 2025

Keycentrix, LLC operates an Interactive Voice Response (IVR) platform that facilitates legitimate voice calls from pharmacies to patients using U.S. phone numbers assigned to those pharmacies. Our platform receives call requests from pharmacy systems and forwards them to our carrier partners [redacted] for delivery to end-users. As a Voice Service Provider (VSP) without a STIR/SHAKEN implementation obligation, we are exempt from implementing the STIR/SHAKEN authentication framework under 47 CFR § 64.6302(d). Nonetheless, we maintain a robust robocall mitigation program to prevent illegal traffic, consistent with 47 CFR § 64.6305(a) and (e).

Exemption from STIR/SHAKEN (47 CFR § 64.6302(d)):

Keycentrix, LLC is exempt from STIR/SHAKEN implementation because we lack control over the network infrastructure and direct access to numbering resources necessary to authenticate calls. Our IVR platform does not operate PSTN gateways, SIP trunks, or other telephony infrastructure; instead, we rely on our carrier partners—fully STIR/SHAKEN-compliant carriers—for call delivery and authentication. The U.S. phone numbers used in our IVR calls are assigned to pharmacies and provisioned through our carriers, not directly allocated to Keycentrix, LLC by the North American Numbering Plan Administration (NANPA) or similar authorities. Consequently, we cannot obtain a STIR/SHAKEN certificate to sign calls ourselves and depend on our carriers' authentication processes.

Robocall Mitigation Program:

To prevent the origination, carrying, or processing of illegal robocall traffic, Keycentrix, LLC has implemented the following reasonable steps:

1. **Verification of Call Legitimacy:** We ensure all IVR calls initiated by pharmacies are for legitimate purposes (e.g., patient appointment reminders, prescription notifications) by requiring pharmacies to authenticate their requests and comply with our usage policies.

2. **Traffic Monitoring:** We actively monitor call patterns on our platform [redacted] to detect signs of abuse, such as high-volume unsolicited calls or calls to numbers on do-not-call lists, flagging suspicious activity for review.
3. **Carrier Collaboration:** We leverage our carriers' STIR/SHAKEN authentication and traffic filtering capabilities to ensure calls are authenticated and screened before reaching end-users.
4. **Traceback Commitment:** Keycentrix, LLC commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperating fully in investigating and stopping any illegal robocallers that misuse our service.

Confidentiality Note: Certain operational details, including [redacted], are requested to be kept confidential per our filing in WC Docket No. 17-97 on the FCC's Electronic Comment Filing System (ECFS). Both confidential (unredacted) and non-confidential (redacted) versions of this document are provided accordingly.

Conclusion:

Keycentrix, LLC's robocall mitigation program ensures compliance with FCC requirements while relying on our carriers' STIR/SHAKEN implementation. We are dedicated to preventing illegal robocalls and supporting industry efforts to protect consumers.

Signed,

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