

AMRK Enterprises Inc Robocall Mitigation Program Description
Submitted: March 24, 2025

AMRK Enterprises is a business that originates outbound calls for operational purposes (e.g., sales, customer service) using Telnyx, a third-party VoIP provider. At Telnyx's request, we are submitting this filing to the FCC's Robocall Mitigation Database. Below, we explain our exemption from compliance and, in the alternative, outline our robocall mitigation program if deemed applicable.

Exemption from Compliance

Rule Cited: 47 CFR § 64.6300(m) – Definition of Voice Service Provider

[Your Company Name] asserts that it is exempt from filing in the Robocall Mitigation Database because it does not meet the definition of a "voice service provider" under 47 CFR § 64.6300(m). We are an end-user business that uses Telnyx's VoIP platform to make outbound calls for our purposes. We do not provide voice services to end users, resell telephony services, or interconnect directly with the Public Switched Telephone Network (PSTN). Telnyx, as our upstream provider, manages the network infrastructure and PSTN interconnection, making them the entity responsible for STIR/SHAKEN implementation (47 CFR § 64.6301) and robocall mitigation obligations (47 CFR § 64.6305). The FCC's rules target providers who control call origination at the network level, not end users like us who rely on a third-party service for telephony. Therefore, we believe the filing requirement applies to Telnyx, not [Your Company Name]. However, at Telnyx's direction, we are submitting this document to support their compliance efforts and ensure continued use of their service.

Robocall Mitigation Program

Suppose the FCC or Telnyx determines that AMRK Enterprises must comply despite our exemption claim. In that case, we certify that all calls we originate through Telnyx's network are subject to the following robocall mitigation program, consistent with 47 CFR § 64.6305(a). We have not implemented the STIR/SHAKEN authentication framework, as this is handled by Telnyx at the network level. We select Option 3: No STIR/SHAKEN Implementation for this filing.

1. Reasonable Steps to Avoid Originating Illegal Robocall Traffic

- Compliance Training: Our team is trained on Telephone Consumer Protection Act (TCPA) and FCC regulations, ensuring calls are made only with prior express consent where required and honoring Do Not Call (DNC) lists.
- Legitimate Call Purposes: All outbound calls are for legitimate business needs (e.g., customer follow-ups, service updates) and not for unsolicited telemarketing or fraudulent activities.
- Telnyx Integration: To avoid misrepresentation or spoofing, we configure our Telnyx account to display accurate caller ID information (our business name and a valid callback number). We rely on Telnyx's platform features, such as call analytics and blocking tools, to prevent illegal traffic.

- Call Monitoring: We review outbound call patterns using Telnyx's dashboard to detect and address any misuse (e.g., high-volume dialing to unconsented numbers).

2. Commitment to Traceback Requests

- We commit to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium (e.g., USTelecom's Industry Traceback Group).

- Upon receiving a request, we will investigate our call records, coordinate with Telnyx to provide necessary data (e.g., call logs), and take immediate action to stop any identified illegal activity.

- Contact Point: Traceback requests can be directed to compliance@premiumcapital.com

3. Cooperation with Authorities

- We will fully cooperate with the FCC, law enforcement, and Telnyx to investigate and halt any illegal robocalls originating from our use of Telnyx's service.

- If misuse is detected (e.g., an employee violating our policies), we will terminate the activity and report it to the appropriate entities.

4. Enforcement

- We maintain internal oversight of call activities via Telnyx's reporting tools and enforce compliance through regular reviews. Violations of our policies result in disciplinary action, up to and including termination of responsible employees.

Signed,

Meir Bozaglo

CEO

AMRK Enterprises Inc

compliance@premiumcapital.com