

XOLO IP LLC

Official Robocall Mitigation Program (RMP) Plan

REGULATORY COMPLIANCE STANDARD // FCC RULE 47 C.F.R. § 64.1200

1. EXECUTIVE ENTITY PROFILE & CORE IDENTIFICATION

This document formalizes the internal regulatory policies, tracking parameters, and enforcement frameworks enacted by XOLO IP LLC to comply fully with the Federal Communications Commission (FCC) instructions under the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act.

FCC Registration Number (FRN)	0036921187
Legal Business Entity Name	XOLO IP LLC
Principal Operations Address	2604 North 27th street house 15, Phoenix, AZ 85008, United States of America
Filing Category Classification	Voice Service Provider Filing
Foreign Voice Service Provider Flag	No (Domestic U.S. Base)
Primary Online Domain Location	www.xoloip.com

2. APPOINTED ROBOCALL MITIGATION OFFICER

The individual assigned below maintains direct executive authority and ultimate operational oversight regarding network analytics deployment, traceback tracking enforcement, customer screening protocols, and regulatory interfaces:

Appointed Officer Name	Tyre Dwight Murphy
Executive Title / Department	President / Admin
Secure Compliance Email	tyre.murphy@xoloip.com
Direct Voice Reach Number	689-223-1864
Physical Service Location Address	2604 North 27th street house 15, Phoenix, AZ 85008, United States of America

Regulatory Notice: Any formal inquiries from the Federal Communications Commission (FCC), the Wireline Competition Bureau, the Enforcement Bureau, or the Industry Traceback Group (ITG) must be routed directly to the mitigation contact parameters specified above.

3. STIR/SHAKEN PROTOCOL IMPLEMENTATION STATUS

XOLO IP LLC strictly complies with federal mandates regarding cryptographic call authentication architectures:

- **SIP-Based Authentication Capability:** For all call originations transitioning over end-to-end IP infrastructure directly governed by XOLO IP LLC, caller identities are processed using STIR/SHAKEN authentication standard mechanics (incorporating components specified in ATIS-1000074 and associated extensions).
- **Non-IP Network Traversal Actions:** For any portions of call flows transitioning across environments lacking native IP routing capabilities, XOLO IP LLC systematically employs rigorous technical mitigation measures to monitor downstream routing dependencies.

4. ADVANCED CUSTOMER SCREENING (KNOW YOUR CUSTOMER / KYC)

To eliminate systemic opportunities for bad actors to access the public switched telephone network (PSTN), XOLO IP LLC requires mandatory verification vetting for all commercial, wholesale, and enterprise customers prior to initial provisioning:

4.1 Identity Verification Requirements

Before service onboarding, the company requires documentation to prove identity and operational legality, including but not limited to:

1. Valid government-issued corporate filings, Articles of Organization, or State-level operating certificates.
2. Valid Employer Identification Numbers (EIN) or corresponding corporate tax validation receipts.
3. Verification of physical operational addresses (via lease agreements or utilities linking back to the verified entity profile).

4.2 Operational Profile Auditing

Prospective customers must explicitly declare their expected traffic dynamics, answering queries regarding:

- Expected maximum concurrent call capacities and average call duration layouts.
- Nature of communications (e.g., promotional marketing, interactive customer notifications, conversational voice patterns, or bulk alerts).
- Licensing validation checks if the client handles traffic patterns matching heavily regulated environments (e.g., financial operations, collections, healthcare alerts).

4.3 Strict Anti-Abuse Contract Clauses

All service user agreements explicitly mandate strict compliance with the Telephone Consumer Protection Act (TCPA), the Telemarketing Sales Rule (TSR), and relevant FCC directives. These contracts specify that any intentional deployment of spoofed, misleading, or deceptive calling identities constitutes a material breach, allowing XOLO IP LLC to instantly terminate service without prior notification.

5. REAL-TIME NETWORK TRAFFIC INSPECTION & ANALYTICS

XOLO IP LLC utilizes continuous network traffic inspection architectures to flag, isolate, and block potential bad actors on the network. The detection rules focus on tracking the following anomalies:

Analytics Marker	Monitored Parameter / Detection Trigger	System Automation Response
High-Volume Burst Flags	Extreme call attempt spikes originating from single accounts over condensed minute intervals.	Immediate Rate Limiting & Account Alert
Short Duration Distribution	Average Length of Call (ALOC) falling beneath 6 seconds across thousands of distinct originations.	Flagged for Manual Compliance Audit
Asymmetric Completion Ratios	Extremely low Call Completion Rates (CCR) accompanied by high immediate drop patterns.	Automatic Verification Request
Invalid Calling Formats	Origination requests displaying unassigned, unallocated, or non-geographic Caller IDs.	Immediate Drop / Call Blocking

6. INDUSTRY TRACEBACK GROUP (ITG) COORDINATION & RESPONSE

XOLO IP LLC prioritizes rapid cooperation with industry groups and enforcement agencies to identify the source of illegal traffic:

- **Rapid Turnaround Standards:** Upon receiving an upstream investigation request from the Industry Traceback Group (ITG) or federal law enforcement authorities, the compliance desk will investigate and respond with historical routing details within a 24-hour window.
- **Upstream Investigation:** Investigations trace the call route backward to find the exact entry point into our infrastructure, identifying the customer account responsible for passing the illegal traffic.
- **Mandatory Upstream Upkeep:** If a customer is found injecting illegal or unauthenticated robocalls, XOLO IP LLC will issue an immediate cease-and-desist demand. Failure to fix the traffic pattern immediately results in a complete suspension of network access.

7. EXECUTIVE DECLARATION & ATTESTATION

I, Tyre Dwight Murphy, certify under penalty of perjury that I am the President of XOLO IP LLC and possess the administrative authority to execute this instrument. I verify that the Robocall Mitigation Program described herein is fully implemented, operational, and audited regularly for structural integrity and compliance with FCC guidelines.

Tyre

Tyre

Tyre Dwight Murphy

President, XOLO IP LLC

Date of Execution: 18 Aug, 2025