

FCC Robocall Mitigation Plan

Company Name: Xen Telecom

FRN: 0036947539

1. Description of Mitigation Practices

Xen Telecom is committed to preventing the origination of illegal and unwanted robocalls on its network. While not yet STIR/SHAKEN-enabled on all parts of its network, Xen Telecom actively employs a robust robocall mitigation program as required under 47 CFR § 64.6305(b).

Our current mitigation measures include:

- **Know-Your-Customer (KYC)** protocols for all upstream clients and resellers.
 - **Manual and automated vetting** of traffic profiles before allowing live traffic.
 - **Routine monitoring** of call signaling data, call volumes, destination patterns, and other indicators of suspicious activity.
 - **Blocking and traceback participation** when potential robocall behavior is detected.
 - **24/7 NOC monitoring** with real-time alerting on spikes in short-duration or high-rate traffic.
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2. Know-Your-Customer (KYC) Measures

Prior to enabling service, Xen Telecom collects and verifies the following for each customer:

- Corporate entity name and address
- Valid government-issued identification or business license
- Description of their use case and expected call volumes
- Traffic type (telemarketing, customer service, etc.)
- Upstream and downstream call paths (when applicable)
- Certification that the customer will not send illegal robocalls

We reserve the right to suspend or terminate service to any customer exhibiting abusive or suspicious behavior.

3. Monitoring and Call Analytics

Xen Telecom uses a combination of internal tools and third-party analytics to flag and investigate suspicious call patterns. This includes:

- Average call duration thresholds
- High-volume short-duration traffic
- Invalid or malformed caller ID strings
- Frequent dialing of high-cost or known scam destinations
- Rapid bursts in traffic not aligned with the use case

All flagged traffic is escalated for immediate review by our compliance and operations teams.

4. Cooperation with Law Enforcement and Industry Efforts

Xen Telecom actively cooperates with:

- The **FCC, FTC**, and **law enforcement** for traceback requests
- The **Industry Traceback Group (ITG)** led by USTelecom
- STIR/SHAKEN implementation partners for digital caller authentication

We respond to traceback requests within 24 hours, and take corrective action within 1–2 business days if a customer is found in violation.

5. Future STIR/SHAKEN Implementation Plans

Xen Telecom is in the process of deploying STIR/SHAKEN technology across its IP-based network and has obtained a valid SPC token. Full deployment is expected by 5/10/2025 pending completion of network upgrades and interoperability testing with downstream partners.

6. Point of Contact for Robocall Mitigation

Name: Oliver Hayes

Title: Chief Executive Officer

Email: support@xentelecom.com

Phone: +1 (877) 668-4810

Address: 3838 Oak Lawn Avenue, Suite 1000

Dallas, TX 75219