

Robocall Mitigation Program

Database Systems Corp

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1. STIR/SHAKEN Implementation Exemption

Database Systems Corp is a reseller of SIP trunking services without control over the underlying network infrastructure. As such, we are **exempt from the STIR/SHAKEN implementation requirement** under **47 CFR §64.6305(d)(2)(i)**.

All customer voice traffic is routed through our upstream provider, **Telnyx**, which fully implements **STIR/SHAKEN authentication** using its Service Provider Code (SPC) token and certificate.

2. Robocall Mitigation Measures

Database Systems Corp employs the following mitigation practices to prevent illegal robocalls:

2.1 Upstream Provider Compliance

We configure client PBX systems (e.g., 3CX) to utilize **Telnyx SIP trunks**, which apply STIR/SHAKEN authentication to all calls, ensuring verified caller identity.

2.2 Caller ID Verification

We enforce **+E.164 caller ID formatting** in all PBX configurations to prevent spoofing and to ensure accurate caller ID presentation.

2.3 Customer Vetting Procedures

We require all SIP trunking customers to provide valid business identification, including:

- Legal Business Name
- Federal EIN
- Verifiable Contact Information

Customers with incomplete or suspicious credentials are denied service until verified.

2.4 Traffic Monitoring

We continuously monitor customer call patterns for indicators of suspicious or abusive behavior, such as unusually high outbound call volumes. Anomalies are investigated promptly.

2.5 Monitoring and Traceback

We actively monitor our systems for irregularities. If we receive a **Traceback request** related to an illegal robocall:

- We will respond immediately.
- We will contact the customer(s) in question and demand a full explanation.
- Corrective actions will be required without delay.
- We will cooperate fully with authorities and respond in a timely manner.

2.6 Regular Audits

Quarterly audits of customer PBX configurations are conducted to verify compliance with **FCC regulations** and **Telnyx SIP trunking requirements**.

3. Commitment to Compliance

Database Systems Corp is fully committed to preventing illegal robocalls and maintaining compliance with all applicable **FCC regulations**. We will revise this mitigation plan as needed to reflect changes in operations or regulatory requirements, and we maintain full cooperation with all enforcement efforts.

Certified by:

Carl Lorenzen, COO

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