

Robocall Mitigation Plan

Company Name: Call-Nexis

FRN: 0037002516

1. Description of Mitigation Practices

Call-Nexis is dedicated to curbing the origination of unlawful and unsolicited robocalls across its network. We operate a robust robocall mitigation program that complies with 47 CFR § 64.6305(b).

Our strategic actions include:

- Enforcing Know-Your-Customer (KYC) procedures for all upstream clients and partners.
- Conducting both manual and automated evaluations of traffic profiles before service activation.
- Implementing real-time analysis of call signaling, traffic volumes, and destination behavior.
- Engaging promptly in traceback investigations and mitigating suspect robocall activity.
- Maintaining 24/7 Network Operations Center (NOC) surveillance with alerting mechanisms for abnormal traffic patterns.

2. Know-Your-Customer (KYC) Measures

Prior to service activation, Call-Nexis verifies the following information from each customer:

- Legal entity name and verified physical location.
- A valid government-issued ID or authentic business license.
- A clear outline of intended use case and estimated call traffic volume.
- Designation of traffic type (e.g., telemarketing, customer support).
- Disclosure of upstream and downstream interconnection details, if relevant.
- A signed declaration affirming non-engagement in illegal robocall activity.

Service may be suspended or terminated if there are indications of misuse or suspicious conduct.

3. Monitoring and Call Analytics

Call-Nexis applies an integrated system of proprietary and third-party tools to proactively monitor call activity and identify abnormal patterns. These include:

- Monitoring for unusually short average call durations.
- Detecting spikes in short-duration, high-volume traffic.
- Identifying malformed or spoofed caller ID details.
- Flagging repeated calls to known fraudulent or premium-rate numbers.
- Tracking bursts in traffic that deviate from the approved use case.

Flagged activity is reviewed immediately by the compliance and operations teams.

4. Cooperation with Law Enforcement and Industry Initiatives

Call-Nexis actively supports industry-wide efforts and regulatory enforcement by:

- Cooperating with the FCC, FTC, and law enforcement during traceback investigations.
- Participating in the Industry Traceback Group (ITG) led by USTelecom.
- Partnering in STIR/SHAKEN integration to support verified caller authentication.

We commit to responding to traceback requests within 24 hours and resolving confirmed violations within 1-2 business days.

5. Future STIR/SHAKEN Implementation Plans

Call-Nexis is working toward full deployment of STIR/SHAKEN technology across its IP-based network and an OCN application is in progress to obtain an SPC token to fully comply with any regulatory requirements in the future.

6. Point of Contact for Robocall Mitigation

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