

ProFoneX LLC Robocall Mitigation Plan

- 7512 Dr. Phillips Blvd, Suite 50-724
 - Orlando, FL 32819
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1. Company Overview

ProFoneX LLC is a **VoIP service provider**. We do not provide direct carrier interconnects. All call origination and termination is handled exclusively by **Telnyx and Commio**, a certified and compliant upstream provider in the FCC's Robocall Mitigation Database.

Our customers use PBX systems that we deploy and manage. We do not allow open APIs, robodialers, or auto-dialing software to connect to our systems. All outbound traffic is placed manually through customer desk phones and routed through Telnyx and Commio for delivery.

2. Customer Vetting Procedures

- All customers are vetted prior to onboarding.
 - We only provide service to established businesses with direct account verification.
 - All customers are met directly (onsite or remote) prior to provisioning service.
 - We prohibit auto-dialing, robocalling, and computer-based dialers on our PBX systems.
 - Dial plans are controlled exclusively by ProFoneX LLC; customers cannot modify routing to enable robo-dialing.
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3. Call Analytics and Monitoring

- ProFoneX LLC operates **Bicom PBX**, which provides detailed call monitoring.
- We maintain **Call Detail Records (CDRs)** for a minimum of **two years**.
- All calls can be traced by originating extension, date/time, and endpoint.

- We conduct traffic pattern monitoring to identify unusual call volumes or suspicious activity.
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4. Upstream Provider Verification

- All origination and termination services are provided by **Telnyx and Commio**
 - Telnyx and Commio is responsible for STIR/SHAKEN implementation, traceback, and authentication.
 - We coordinate with Telnyx and Commio in the event of a traceback request or suspected illegal traffic.
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5. STIR/SHAKEN Implementation

- All outbound calls from ProFoneX LLC customers are signed and authenticated by **Telnyx and Commio** under its STIR/SHAKEN implementation.
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6. Traceback Response Commitment

- ProFoneX LLC commits to responding to any traceback requests within **24 hours**.
 - We will provide CDRs and cooperate with the Enforcement Bureau, USTelecom's Industry Traceback Group (ITG), Telnyx, and Commio to ensure rapid resolution.
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7. Enforcement History

- Computer Technologies Group has not been the subject of any FCC enforcement actions, robocall complaints, or traceback investigations.
- To date, no customers have been identified as originating robocalls through our systems.

8. Compliance Commitment

Profonex LLC affirms its commitment to the FCC's robocall mitigation rules under **47 CFR § 64.6305**.

We will:

- Maintain updated certifications and mitigation measures.
 - Continue using only certified upstream providers.
 - Ensure no illegal robocall traffic originates from our systems.
 - Fully comply with all FCC traceback and reporting requirements.
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