

Xybertek Robocall Mitigation Program Description

1. Overview

Xybertek is a VoIP reseller and white-label provider that resells services from Skyswitch, which operates the underlying voice network. All calls originated on Skyswitch's network are subject to STIR/SHAKEN authentication and comply with 47 CFR § 64.6301(a) and (b).

2. Robocall Mitigation Measures

Xybertek has implemented the following measures to prevent illegal robocalls:

- **Customer Verification & Onboarding:** All customers must complete a verification process, including providing valid contact information and agreeing to the Xybertek Acceptable Use Policy (AUP), which prohibits illegal robocalling.
- **Traffic Monitoring:** Xybertek monitors customer call patterns for anomalies, unusual volume, or patterns indicative of robocalling activity.
- **Opt-in Policies:** Customers are required to obtain prior consent from call recipients when necessary, in compliance with federal and state regulations.
- **Education & Guidance:** Xybertek provides guidance to customers on legal calling practices and updates them on regulatory requirements.

3. Traceback & Cooperation Procedures

Xybertek commits to responding **fully within 24 hours** to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. The company cooperates in investigating and stopping any illegal robocallers that use its service.

4. STIR/SHAKEN Implementation

While Xybertek does not implement STIR/SHAKEN on its own network (see exemption below), all calls originated through Skyswitch's network are STIR/SHAKEN-compliant.

5. Exemption Statement

Under 47 CFR § 64.6301 and § 64.6305, filers that do not operate their own underlying voice network are not required to implement STIR/SHAKEN themselves. Xybertek qualifies for this exemption because it resells services from Skyswitch.

6. Commitment

Xybertek maintains a robust robocall mitigation program and will continue to take reasonable steps to prevent illegal robocall traffic, maintain compliance, and support law enforcement investigations.