

BCM One Robocall Mitigation Compliance with TRACED Act

- BCM One, Inc.
- Arena One, LLC
- CoreDial, LLC
- BCM One Cloud Communications, LLC
- nexVortex, LLC
- PayG, LLC
- SIP.US LLC
- Wholesale Carrier Services, Inc.
- Pure IP US LLC

BCM One, Inc., a voice service provider, and its affiliated entities as listed in the Appendix (the “Company”), submit this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to Section 64.6305 of the FCC’s rules. The Company has taken specific reasonable steps, as set forth below, to avoid originating and processing illegal robocall traffic.

A list of the Company’s Principals, Affiliates, Subsidiaries and Parent Companies can be found in the Appendix.

STIR/SHAKEN

The Company has fully implemented STIR/SHAKEN. All calls that the Company originates are compliant with Sections 64.6301(a)(1) and (2) of the Commission’s rules.

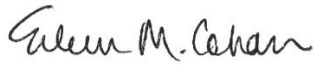
TRACEBACK

The Company commits to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. The Company will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our service to carry, process, or originate robocalls.

ENFORCEMENT

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan. The Company and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program. The Company has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

I, Eileen Cohan, submit this certification on behalf of BCM One, Inc., which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.



_____ (signature)

July 17, 2025

_____ (date)

MITIGATION PROGRAM

The Company utilizes a combination of internal tools and trusted third parties (e.g., other peer service providers, end user complaints). In coordination with the ITG, Company performs Do Not Originate (“DNO”) based upon a reasonable DNO list, which may include blocking of government and other impersonation calls. The Company updates its tools to keep ahead of and detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes internal data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Company uses data systems for analytics to identify illegal robocalling in addition to the Know Your Customer (KYC) requirements. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- All new customers are vetted with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

The Company has an Upstream Provider Policy required to access the Company’s networks to ensure that such customers and providers do not or are not likely to engage in any prohibited conduct. If the customer is a Voice Service Provider, the Company confirms that the provider is appropriately listed in the FCC’s RMD and has not been delisted pursuant to an enforcement action before accepting traffic from the provider.

The Company’s service agreements contain acceptable use and traffic integrity terms that prohibit the use of Company services for illegal purposes including but not limited to robocalling. Company has the right to terminate services for fraudulent use of our services, for illegal, improper or unauthorized use of services, and/or for violations of any laws, rules and regulations applicable to the use of Company services... The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company’s networks.

The Company will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.

The Company reserves the right to modify and/or supplement this Robocall Mitigation Plan to adapt to risks and to improve the overall effectiveness of our program.

APPENDIX

BCM One, Inc.

Contact Person: Douglas Fechter, Chief Financial Officer
Address: 295 Madison Ave. 5th Floor, New York, NY 10017
Phone No.: 212-849-2202
Email address: regulatory@bcmone.com
OCN: 738j

Arena One, LLC

Contact Person: Douglas Fechter, Chief Financial Officer
Address: 295 Madison Ave. 5th Floor, New York, NY 10017
Phone No.: 212-849-2202
Email address: regulatory@bcmone.com
OCN: 738j

CoreDial, LLC

Contact Person: Jennifer Nading, SVP UCaaS Operations
Address: 751 Arbor Way, Suite 150, Blue Bell, PA 19422
Phone No.: 747-777-8100 x4619
Email address: regulatory@bcmone.com
OCN: 738j

BCM One Cloud Communications, LLC

Contact Person: Douglas Fechter, Chief Financial Officer
Address: 295 Madison Ave. 5th Floor, New York, NY 10017
Phone No.: 212-849-2202
Email address: regulatory@bcmone.com
OCN: 738j

nexVortex, LLC

Contact Person: Lita Miller, Chief Operating Officer
Address: 510 Spring Street, Herndon, VA 20170
Phone No.: 703-439-2726
Email address: regulatory@bcmone.com
OCN: 738j

PayG, LLC dba SkySwitch

Contact Person: Jennifer Nading, SVP UCaaS Operations
Address: 751 Arbor Way, Suite 150, Blue Bell, PA 19422
Phone No.: 747-777-8100 x4619
Email address: regulatory@bcmone.com
OCN: 738j

SIP.US LLC

Contact Person: Lita Miller, Chief Operating Officer

Address: 12725 Morris Road, Suite 420, Alpharetta, GA 30004

Phone No.: 703-439-2726

Email address: regulatory@bcmone.com

OCN: 738j

Wholesale Carrier Services, Inc.

Contact Person: Randy Lemmo, SVP Operations

Address: 295 Madison Ave. 5th Floor, New York, NY 10017

Phone No.: 954-905-4241

Email address: regulatory@bcmone.com

OCN: 738j

Pure IP US LLC

Contact Person: Tara-Elese Galea, Operations Director

Address: 295 Madison Ave., 5th Floor, New York, NY 10017

Phone No.: 415-800-0799

Email address: legalcomp@pure-ip.com

OCN: 738j

PRINCIPALS, AFFILIATES, SUBSIDIARIES AND PARENT COMPANIES

BCM One Group Holdings, Inc.

(Delaware; September 14, 2018)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Chief Executive Officer
Marc Fribush	Outside Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

BCM One, Inc. (f/k/a McGraw Communications, Inc.)

(New York; June 25, 1996)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

BCM One Acquisition, Inc.

(New York; June 23, 2016)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

BCM One, Inc.

(Virginia; May 5, 2002)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

WCS Asia, Inc.

(Philippines; May 3, 2013 initially formed as SinglePoint Call Centers, Inc.)

Directors:

Jesse Klein
Geoffrey Bloss
Albert Joseph Gan

Officers:

Jesse Klein	Chairman
Geoffrey Bloss	President
Albert Joseph Gan	Treasurer
Ina Alexandra A. Dominguez	Corporate Secretary
Sabrina Salgado-Go	Assistant Corporate Secretary

Wholesale Carrier Services, Inc.

(Delaware; July 15, 2021; initially formed in Florida on May 20, 1996)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Wholesale Carrier Services of Virginia, Inc.

(Virginia; October 11, 2007)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Business Communications Management, LLC

(New York; November 14, 1991; formerly Business Communications Management, Inc. – converted to LLC November 16, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

SIP.US LLC

(Delaware; May 30, 2012; initially formed in Florida, converted to Delaware on February 6, 2019)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

PayG, LLC

(Delaware; May 10, 2011; initially formed in Florida, converted to Delaware on December 21, 2020)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Outforce, Inc.

(Florida; May 25, 2017)

Directors:

Jesse Klein	Fund Director
Robert C. Dunn	Fund Director
John P. Cunningham	Other Director
Francis X. Ahearn	Other Director
Geoffrey Bloss	Other Director
Sandy Preizler	Other Director
Marc Fribush	Other Director

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

ReachUC LLC

(Delaware; July 22, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

ConnectUC LLC

(Delaware; March 27, 2023)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

VoIPSync, LLC

(Delaware; December 12, 2024)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

nexVortex, LLC

(Delaware; August 15, 2002; formerly nexVortex Inc. – converted to LLC July 30, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

CoreDial, LLC

(Delaware; July 18, 2005)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Voice4net.com, LLC

(Delaware; December 17, 1996; initially formed in Texas as Voice4net.com, Inc., converted to Delaware on November 17, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

CoreNexa, LLC

(Delaware; August 12, 2016; initially formed in Pennsylvania, converted to Delaware on November 17, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

CD Meetings, LLC

(Delaware; August 17, 2020)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

LincLogix, LLC

(Delaware; March 6, 2003; December 21, 2020; initially formed in Indiana, converted to Delaware on December 21, 2020)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

BCM One Cloud Communications, LLC

(Delaware; February 15, 2022)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

SIPTRUNK, LLC

(Delaware; July 9, 2014; formerly Business Communications Management, Inc. – converted to LLC November 15, 2021)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Manager
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Arena One, LLC

(New York; September 23, 2004)

Managers:

Jesse Klein	Fund Manager
Robert C. Dunn	Fund Manager
John P. Cunningham	Other Manager
Francis X. Ahearn	Other Manager
Geoffrey Bloss	Other Manager
Sandy Preizler	Other Director
Marc Fribush	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Pure IP US LLC

(Delaware; November 14, 2012)

Managers:

Jesse Klein	Fund Manager
Sandy Preizler	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Pure IP New York LLC

(Delaware; September 4, 2013)

Managers:

Jesse Klein	Fund Manager
Sandy Preizler	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary

Pure IP California LLC

(Delaware; September 4, 2013)

Managers:

Jesse Klein	Fund Manager
Sandy Preizler	Other Manager

Officers:

Sandy Preizler	Chief Executive Officer
Elizabeth R. Borow	Treasurer
Jesse Klein	Vice President and Secretary
Clayton Milburn	Vice President
Robert C. Dunn	Vice President
Douglas Fechter	Chief Financial Officer
Eileen Cohan	Assistant Secretary