

Robocall Mitigation Plan for Micro Excell LLC Date: September 11, 2025

Submitted to: Federal Communications Commission (FCC) Robocall Mitigation Database

Company Information:

- Name: Micro Excell LLC
 - FCC Registration Number (FRN): 833904
 - Address: 101 Broad St, Gadsden, AL 35901
 - Primary Contact: Bentley Johnston, bentley@microxl.com, (256) 547-8500
 - Service Type: Interconnected VoIP
 - Subscriber Base: Fewer than 50 subscriber lines
 - Network Type: IP-based
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1. Introduction Micro Excell LLC is a small, interconnected VoIP provider committed to preventing illegal robocalls and protecting our customers from unwanted and fraudulent calls, in compliance with the FCC's regulations under the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act and the STIR/SHAKEN caller ID authentication framework. With fewer than 50 subscriber lines, we qualify as a small provider and face resource constraints that limit full STIR/SHAKEN implementation at this time. This robocall mitigation plan outlines the reasonable steps we are taking to prevent the origination of illegal robocalls on our network and our commitment to achieving full compliance.

2. STIR/SHAKEN Implementation Status

- Current Status: Micro Excell LLC operates a fully IP-based VoIP network but has not yet implemented STIR/SHAKEN due to resource limitations typical of a small provider with fewer than 50 subscriber lines. We are actively pursuing measures to mitigate robocalls through alternative methods described below.
 - Extension Status: Micro Excell LLC qualifies for the FCC's small provider extension for STIR/SHAKEN implementation (available to providers with $\leq 100,000$ lines). We intend to confirm our eligibility and apply for this extension if not already granted.
 - Plan for Full Implementation: We plan to achieve full STIR/SHAKEN compliance by June 30, 2027, by upgrading our network infrastructure to support caller ID authentication, obtaining necessary certificates from a Policy Administrator, and integrating STIR/SHAKEN protocols.
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3. Robocall Mitigation Measures to significantly reduce the origination of illegal robocalls, Micro Excell LLC has implemented the following measures, tailored to our small-scale VoIP operations:

- 3.1. Call Authentication and Verification
- Alternative Authentication Methods: Since full STIR/SHAKEN implementation is not yet feasible, we:
 - Verify caller ID information against customer records to ensure calls originate from legitimate subscribers.
 - Assign B-level or C-level attestation to calls based on our knowledge of the call originator, following STIR/SHAKEN principles where applicable.
 - Use basic network analytics to flag suspicious call patterns, such as high-volume or short-duration calls.
 - Customer Vetting: Given our small subscriber base (<50), we conduct thorough due diligence on all customers, including:
 - Requiring proof of identity and business purpose during onboarding.
 - Monitoring accounts for signs of spoofing or unauthorized use.

3.2. Network Monitoring and Analysis

- Real-Time Monitoring: We use basic VoIP monitoring tools/software to detect suspicious call activity, including:
 - Calls with invalid or mismatched caller ID information.
 - Unusual call volumes from a single subscriber.
- Traffic Analysis: We review call detail records (CDRs) weekly to identify potential robocall patterns, such as sequential dialing or calls flagged by downstream providers.
- Blocking Mechanisms: We manually block calls identified as fraudulent or illegal based on analytics or customer complaints, ensuring rapid response to potential abuse.

3.3. Cooperation with Industry and Regulatory Bodies

- Traceback Participation: We commit to responding to all traceback requests from the Industry Traceback Group, FCC, or law enforcement within 24 hours, providing relevant call data to identify robocall sources.
- Database Compliance: We have registered (or will register) with the FCC's Robocall Mitigation Database and will update our certification within 10 business days of any changes to our mitigation practices or STIR/SHAKEN status.

- Collaboration with Partners: We work with upstream and downstream VoIP providers to share information about robocall threats and ensure proper call handling.

3.4. Consumer Protection Measures

- Customer Education: We inform our small subscriber base about robocall risks via email and our website (www.microxl.com) (www.microxl.com), recommending call-blocking tools available on their devices or through third-party apps.
- Complaint Handling: We maintain a dedicated contact point (bentley@microxl.com, (256) 547-8500) for robocall complaints, resolving issues within 48 hours and forwarding relevant complaints to the FCC.
- Do-Not-Call Compliance: We ensure compliance with the National Do Not Call Registry, prohibiting subscribers from initiating calls to registered numbers without consent.

3.5. Contractual and Policy Safeguards

- Customer Agreements: Our service agreements explicitly prohibit subscribers from using our network for illegal robocalls or caller ID spoofing. Violators face immediate account suspension or termination.
 - Vendor Oversight: We require any third-party VoIP partners to adhere to FCC robocall mitigation standards, with compliance clauses in all contracts.
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4. Metrics and Effectiveness to evaluate our robocall mitigation efforts, we:

- Track blocked calls and suspicious activity monthly, maintaining internal records.
 - Monitor customer complaints and aim to resolve robot-call-related issues within 48 hours.
 - Conduct quarterly reviews of our mitigation practices to identify improvements.
 - Retain compliance records for at least 3 years for potential FCC audits.
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5. Commitment to Ongoing Improvement Micro Excell LLC is dedicated to enhancing our robocall mitigation efforts. We will:

- Update this plan annually or as needed based on FCC guidance and industry best practices.
- Invest in network upgrades to support STIR/SHAKEN by June 30, 2027.

- Participate in FCC workshops and industry forums to stay informed about robocall prevention strategies.

6. Certification Micro Excell LLC certifies that this robocall mitigation plan accurately reflects the reasonable steps we are taking to prevent the origination of illegal robocalls. We commit to filing this plan in the FCC's Robocall Mitigation Database and updating it within 10 business days of any material changes. We further certify our cooperation with FCC investigations and industry traceback efforts. Signed:

Bentley Johnston
Owner, Micro Excell LLC
September 11, 2025