



T38Fax Robocall Mitigation Plan

V1.3

Version History

Version	Date	Author	Summary of Changes
1.2	2025-09-12	Matthew Beckwell	Initial revision
1.3	2026-02-27	Darren Nickerson	Updated traceback, monitoring, upstream management, junk fax enforcement, DNO registry placement; added record retention and periodic review sections

Approval History

Version	Approver	Title	Date
1.2	Darren Nickerson	President	2025-09-12
1.3	Darren Nickerson	President	2026-02-27

Robocall Mitigation Plan

1. Service Type and STIR/SHAKEN Applicability

T38Fax Incorporated ('T38Fax') operates exclusively as an Information Services Provider for facsimile transmission services (Fax Only). Voice calling is strictly prohibited on its network. As the service is limited to fax protocols (ITU T.38 and T.30), and T38Fax does not provide voice calling services, our network cannot be exploited by robocallers and traditional STIR/SHAKEN requirements for voice traffic do not apply. T38Fax recognizes the important role STIR/SHAKEN plays in today's communication networks, however, and has fully implemented STIR/SHAKEN authentication. T38Fax also maintains comprehensive monitoring and mitigation measures appropriate to its service type.

2. Traceback Commitment

T38Fax commits to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within 24 hours. Traceback requests should be directed to the T38Fax Network Operations team via the contact information on file with the Robocall Mitigation Database. A designated compliance liaison within Network Operations is responsible for coordinating all traceback responses and maintaining communication with requesting parties through resolution.

T38Fax will cooperate fully to investigate any complaints, whether related to suspected voice usage on its fax-only network or junk fax violations. If voice traffic is detected or reported on its network, T38Fax will immediately investigate and take enforcement action as this violates its terms of service.¹

3. Robocall and Voice Traffic Mitigation Program

T38Fax has implemented the following measures to prevent illegal robocalling and unauthorized voice usage:

a. Upstream Provider Management

T38Fax maintains relationships with its upstream providers who are required to implement STIR/SHAKEN where applicable and maintain their own robocall mitigation practices in compliance with FCC requirements. T38Fax monitors its upstream providers' compliance status through the FCC Robocall Mitigation Database and will only work with providers who maintain current certifications.

T38Fax conducts quarterly reviews of all upstream providers' certification status in the Robocall Mitigation Database. If a provider's certification lapses or is found deficient, T38Fax will notify the provider and require remediation within 30 days. If the provider fails to restore compliance within that period, T38Fax will initiate a transition to an alternative provider and cease routing traffic through the non-compliant provider within 60 days of the initial notification.

b. Technical Monitoring Infrastructure

T38Fax employs continuous traffic monitoring systems that analyze all transmissions to verify fax-only usage by examining:

- Protocol analysis to confirm fax transmission methods (ITU T.38 and T.30)
- Detection of voice codec usage which triggers immediate alerts
- Call duration patterns consistent with fax transmission

¹<https://www.t38fax.com/terms-conditions>

- Destination analysis against T38Fax's internally maintained database to identify numbers known to be voice-only services (toll-free customer service lines, automated voice response systems, etc.)
- Detection of traffic to destinations incompatible with fax transmission
- Traffic volume and pattern analysis for anomaly detection
- Call detail record analysis for suspicious patterns including:
 - Burst patterns characteristic of robocalling campaigns
 - Sequential dialing patterns
 - Repeated short-duration call attempts

c. Real-Time Monitoring and Response Protocol

All traffic is monitored via real-time automated analytics using on-premise technology without reliance on third parties. When non-fax protocols or suspicious patterns are detected:

- Immediate alert generation for operations staff
- Investigation within 4 business hours
- Customer contact within 24 hours when voice usage is suspected
- Account suspension for confirmed voice usage pending termination

d. Know Your Customer Procedures

1. All customers must acknowledge during the self-directed signup process that the service is fax-only and that voice calling is prohibited
2. T38Fax collects and verifies: business name, physical address, contact information, and intended fax use case
3. Customers requesting high-volume services undergo enhanced vetting to confirm legitimate needs and TCPA compliance
4. Accounts showing unusual patterns are placed on enhanced monitoring

e. Junk Fax Compliance

T38Fax investigates all junk fax complaints within 48 hours and requires customers to provide proof of consent for fax advertising per TCPA requirements.

When an investigation confirms a junk fax violation, T38Fax enforces the following graduated response:

- **First offense:** Written warning issued to the customer with a requirement to demonstrate TCPA-compliant consent within 10 business days.
- **Second offense:** Immediate account suspension pending review. The customer must provide a remediation plan and evidence of corrective action before service is restored.
- **Third offense or egregious violation:** Permanent account termination.

In all confirmed violation cases, T38Fax will report the matter to the FCC if the violation appears to be part of a pattern of willful non-compliance or involves a significant volume of unsolicited fax transmissions.

4. Foreign Provider Status

T38Fax is not a foreign voice provider.

5. Enforcement History

Neither T38Fax nor any entity sharing common ownership, management, directors, or control with T38Fax has been the subject of any Commission, law enforcement, or regulatory agency action regarding robocalling, spoofing, or deficient RMD certification.

6. Database Filing Status

T38Fax has not been prohibited from filing in the Robocall Mitigation Database.

7. Record Retention

T38Fax retains the following records for a minimum of 24 months to support traceback investigations, regulatory inquiries, and internal compliance review:

- Call detail records (CDRs) for all transmissions
- Traffic monitoring logs and alert records
- Customer complaint records and investigation files
- Traceback request and response correspondence
- KYC documentation and customer vetting records
- Upstream provider compliance review records
- Enforcement action documentation (warnings, suspensions, terminations)

Records are stored securely with access limited to authorized compliance and operations personnel. Retention periods exceeding 24 months may apply where an active investigation, regulatory proceeding, or legal hold is in effect.

8. Periodic Plan Review

T38Fax reviews and, where necessary, updates this Robocall Mitigation Plan at least annually. Reviews are conducted by the Network Operations team in consultation with company leadership and are prompted by any of the following:

- The annual review cycle (no later than 12 months from the last approved revision)
- Changes to FCC rules, orders, or enforcement guidance affecting robocall mitigation or STIR/SHAKEN requirements
- Material changes to T38Fax's network architecture, upstream provider relationships, or service offerings
- Findings from traceback investigations, enforcement actions, or compliance reviews

All revisions are documented in the Version History table and require approval by the President of T38Fax before filing in the Robocall Mitigation Database.