

Phoenix Telecom LLC ROBOCALL MITIGATION PLAN

Below is the Robocall Mitigation Plan filing for Phoenix Telecom LLC This plan will be submitted to the FCC's Robocall Mitigation Database and will be adapted to adjust to the latest laws, regulations, and industry best practices.

Phoenix Telecom LLC has monitoring and reporting systems in place to analyze high-volume voice network traffic to identify and monitor patterns consistent with robocalls. Our monitoring systems provide alerts on calling patterns with unusual spikes, traffic patterns, or attempted use of non-validated Telephone Number (TN) to detect patterns consistent with illegal robocalls.

Pursuant to 47 C.F.R. § 64.6305 Phoenix Telecom LLC submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Phoenix Telecom LLC has in place to mitigate illegal robocalls as of August 24, 2025. Phoenix Telecom LLC may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time to respond to changes in its business, its capabilities and its needs.

Phoenix Telecom LLC role in the network is Non-Gateway Intermediate Provider providing service to wholesale users. Phoenix Telecom LLC only accept pre tokenized calls. Any calls without their own token are rejected. Furthermore, Phoenix Telecom LLC is a Voice Service provider for our retail traffic only. We attest all retail traffic that is being dialed through our network with a A attestation. Since we manage their campaigns and know what traffic they are sending.

Phoenix Telecom LLC is judiciously working to prevent unlawful robocalls from originating on its network while in the process of installing the new STIR/SHAKEN authentication architecture. Phoenix Telecom LLC ensures rigorous compliance with the STIR/SHAKEN standards and the PalloneThune Telecom Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act. The Company has implemented the following robocall mitigation plan to address unlawful robocall traffic.

Phoenix Telecom LLC also implemented Voice Shield and Roboguard through fraudcentral.io, SipShield through Telucom and Smart Shield through Veriswitch to monitor our traffic. We also have implemented valid cli on all of our traffic to prevent any spoofing.

Phoenix Telecom LLC has enforceable terms of use and/or an acceptable use policy noted in its contracts. These policies define the circumstances by which the company will deny, suspend, or terminate service to a customer. We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

Phoenix Telecom LLC confirms that the upstream providers have a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider. We have been informed of the upstream providers "Know-Your-Customer" guidelines and have provided them with the necessary KYC documentation they've requested that we complete.

Phoenix Telecom LLC follows the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers.

This process includes the collection and review of entity-identifying information to confirm that Phoenix Telecom LLC has an authenticated relationship with the customer. The Company uses this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

Phoenix Telecom LLC also validates, when possible, that the entity has a legitimate right to use its asserted calling numbers. The Company uses this information to support the attestation level it assigns to calls that it originates for that customer.

Phoenix Telecom LLC contractual provisions with customers prohibit them from initiating illegal robocalls. If the Company discovers a customer is initiating suspicious robocalls, it warns them to stop. If such traffic continues, then the Company terminates their service.

Phoenix Telecom LLC requires that upstream providers have a reasonable Robocall Mitigation Plan, including a vetting process for their customers as well as their upstream providers, and that they use call analytics to identify suspicious traffic.

Prior to installing services for new customers, Phoenix Telecom LLC takes the following measures to weed out end users that could potentially generate robocall traffic: Our Know-Your-Customer (KYC) confirms the following about its customers:

- Customer's identity
- Customer's right to use the telephone number presented on calls
- Service Address
- Authenticated legal campaigns and compliance
- 499 Filer ID
- Robocall Mitigation Plan and RMD #
- FEIN Number
- Customers Tokens

Phoenix Telecom LLC's contract explicitly prohibits the initiation of illegal robocalls, with immediate termination for non-compliance.

When the customer is a business, Phoenix Telecom LLC requires Business Incorporation Documents and verifies they have a reputation as a valid business that abides by the law.

Phoenix Telecom LLC will immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If the Company determines that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

Phoenix Telecom LLC will comply fully with all conditions set forth in the FCC'S 2024 Report and Order Mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Phoenix Telecom LLC has designated an individual as a dedicated point of contact for addressing traceback requests. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. Phoenix Telecom LLC will respond promptly to inquiries from the Industry Traceback Group (ITG) within 24 hours.

If Phoenix Telecom LLC detects a pattern consistent with illegal robocalls, or we have reason to suspect illegal robocalling or spoofing is taking place over our network, we will seek to identify the party that is using our network to originate, route, or terminate these calls. And take appropriate action.

Appropriate action will

- Suspend and/or terminate client

Phoenix Telecom LLC will provide valid law enforcement and regulatory agencies with the relevant nonproprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities, and implement mandated Robocall Mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls. We respond within 24 hours to all traceback requests from the Commission, law Enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use the Company's service to originate, carry, or process illegal robocalls.

Phoenix Telecom LLC performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call. Phoenix Telecom LLC has not had any agency action or investigation due to suspected unlawful robocalling or investigations.