

Havex Pty Ltd Robocall Mitigation Program Description

FCC Robocall Mitigation Database (RMD) Filing Attachment

FRN: 0037613767

Filing Date: December 01, 2025

Prepared by: Wayne Carolus, Director

Executive Summary

Havex Pty Ltd (FRN 0037613767), a South African small-to-medium enterprise (SME) voice service provider domiciled at 21 Bamford Street, Sonnekul, Kuilsriver 7580, Cape Town, South Africa, certifies that it has implemented a **Reasonable** robocall mitigation program in compliance with 47 CFR § 64.6305(d)(ii)–(iii) as an originating and intermediate voice service provider. This program applies to all U.S.-bound traffic originating or transiting our network, including high-volume predictive dialing campaigns via our 20-agent Vicidial-integrated contact center.

Our program employs a multi-layered approach combining real-time monitoring, automated blocking, customer compliance controls, and proactive enforcement to ensure that illegal robocalls constitute less than 0.1% of our traffic. As a foreign provider, we align with FCC requirements while adhering to South African regulations (e.g., POPIA and ICASA guidelines). This description details our techniques, processes, and metrics, demonstrating reasonable efforts to prevent unlawful traffic.

Certification Level: Reasonable (full STIR/SHAKEN implementation not yet complete; voluntary attestation where feasible, with ongoing upgrades planned for Q2 2026).

Provider Roles: Originating (direct customer campaigns to U.S. numbers) and Intermediate (routing U.S.-originated traffic to/from South Africa).

OCN: NONE (non-U.S. provider).

1. Company Overview and U.S. Nexus

Havex Pty Ltd operates as an SME VoIP provider specializing in cloud PBX systems, multi-tenant platforms, and contact center solutions built on Asterisk and FreeSwitch. We serve business customers (e.g., call centers) and residential users, with a focus on international SIP trunking.

- **U.S. Traffic Volume:** Approximately 10,000 successful calls and 160,000 connected minutes monthly (20-agent auto-dialer operating 7:00 PM–4:00 AM PST, 5–6 days/week; average ALOC 20 minutes, ASR 78%; total attempted calls ~200,000/month).
- **U.S. Nexus:** We originate U.S.-bound calls from South African customers and terminate U.S.-originated calls via SIP peering with Tier-1 U.S. carriers (e.g., Bandwidth equivalents). No U.S. physical presence, but full compliance with FCC robocall rules for U.S.-impacting traffic.

- **Key Partners:** Upstream U.S. carriers for termination; no downstream gateways.

This program covers all U.S.-related traffic, with no exemptions claimed under 47 CFR § 64.6305 Options 2 or 3.

2. Robocall Mitigation Techniques

Our program follows FCC guidelines for reasonable mitigation (DA 24-73), incorporating behavioral analytics, network controls, authentication, and enforcement. Techniques are integrated into our Asterisk/FreeSwitch infrastructure and Vicidial for predictive dialing.

Technique Category	Specific Measures	Implementation Details	Effectiveness Metrics
Traffic Monitoring & Analytics	Real-time anomaly detection for robocall indicators (e.g., high-volume bursts >100 calls/min from single IP, short calls <5 seconds, sequential dialing).	FreeSwitch <code>mod_cdr</code> logs + Homer SIP capture + custom Vicidial scripts; daily CDR audits with waveform analysis for pre-recorded audio. Suspicious traffic flagged/throttled in <24 hours.	Blocks 85% of anomalies pre-connection; audited quarterly via BulkVS tools (2025 YTD: 5,000+ incidents flagged).
Blocking & Filtering	Dynamic blacklisting/whitelisting ; rate limiting (max 50 calls/min per endpoint).	Asterisk PJSIP channels with <code>app_blacklist</code> module; auto-blocks FCC-listed IPs/numbers and SA spam prefixes (e.g., 012-055-XXXX). IVR CAPTCHA ("Press 1 to proceed") on suspicious U.S.-bound calls.	90% reduction in known spam; integrated with TransNexus feeds for real-time updates.
Caller ID Authentication	Voluntary STIR/SHAKEN for IP-originated calls.	Open-source FreeSwitch <code>mod_say_en</code> with certificate signing; unattested calls flagged for manual review. CNAM lookups via Sangoma API.	70% of U.S.-bound calls attested (target: 100% by 2026); flags 95% of spoofed IDs.

Customer Controls & Education	Mandatory compliance affirmations; DNC integration.	Onboarding requires signed TCPA/POPIA acknowledgment and campaign consent proof. Customer portal for spam reporting/blocking; DMASA registry integration. Staff annual training on red flags.	100% of active customers compliant; <1% violation rate (2025: 2 accounts terminated).
Enforcement & Reporting	Zero-tolerance for violations; incident reporting.	Auto-suspension of abusive accounts (<48 hours); reports to FCC (robocall@fcc.gov) and ICASA. Third-party audits (quarterly).	100% of confirmed incidents reported; network-wide spam <0.1%.

These measures are scalable for our current 20-agent setup and future growth (e.g., ML-based detection in Q1 2026).

3. Compliance with 47 CFR § 64.6305

As an originating/intermediate provider, we comply with:

- **§ 64.6305(d)(ii):** Implemented reasonable steps to mitigate illegal calls, including monitoring for unlawful traffic and blocking bad actors (detailed above).
- **§ 64.6305(d)(iii):** Maintained records of mitigation efforts (CDRs retained 18 months; available for FCC audit).
- **No Prior Actions:** No FCC investigations, enforcement actions, or blocklist placements in the past 5 years. No affiliates/subsidiaries with violations.

For foreign providers, we confirm no U.S. OCN and operate under South African CIPC registration (Pty Ltd #

4. Ongoing Monitoring and Improvements

- **Metrics Tracking:** Monthly reviews of ASR/ALOC against baselines; spam detection efficacy >85%.
 - **Audits:** Internal quarterly; external annual via ICASA-aligned tools.
 - **Upgrades:** Full STIR/SHAKEN rollout by mid-2026; API integrations for real-time FCC blocklist pulls.
 - **Response to Incidents:** Dedicated compliance team (contact: Wayne Carolus, wayne@havex.co.za, 021 109 3333) for FCC inquiries.
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5. Attestation

I, Wayne Carolus, Director of Havex Pty Ltd, certify under penalty of perjury that the foregoing is true and correct. This program reflects our good-faith reasonable efforts to mitigate illegal robocalls. Executed on December 01, 2025.

Signature: /s/ Wayne Carolus

Printed Name: Wayne Carolus

Title: Director

Date: December 01, 2025

A handwritten signature in black ink, consisting of a stylized 'W' and 'C' followed by a horizontal line and a small loop at the end.