

## CIBERSYS CORP

### Robocall Mitigation Program Description

### FCC Robocall Mitigation Database Filing

### 47 CFR § 64.6305 Compliance Statement

#### 1. Overview

Cibersys Corp is a non-facilities-based VoIP service provider that originates outbound calls exclusively through upstream carriers that fully implement the STIR/SHAKEN authentication framework in accordance with 47 CFR § 64.6301(a)(1)-(2). As such, the company is exempt from direct STIR/SHAKEN deployment under 47 CFR § 64.6304(a)(1). Despite this exemption, the company maintains a comprehensive Robocall Mitigation Program (RMP) designed to prevent the origination of unlawful robocall traffic and ensure full compliance with 47 CFR § 64.6305(a).

#### 2. Customer Vetting and Onboarding Controls (KYC/KYB)

- Verification of business identity through corporate filings, government-issued identification, and tax registration.
- Validation of the customer's service purpose and call-use profile.
- Screening for prior enforcement actions, fraud activity, or red flags.
- Prohibition of high-risk use cases such as caller ID spoofing, toll fraud schemes, and unverified lead-generation campaigns.
- Requirement of written acknowledgment of compliance with TCPA, FCC rules, and all robocall regulations.

#### 3. Traffic Monitoring and Analytics

Cibersys Corp monitors outbound call traffic in real time to detect anomalies associated with illegal robocalls:

- Analysis of call volume patterns, short-duration spikes, and burst activity.
- Identification of suspicious calling campaigns or sequential dialing.
- Automated alerts for irregular calling behavior.
- Continuous review of call destination patterns and abnormal ratios of unanswered or brief-duration calls.
- Cooperation with upstream carriers' fraud detection systems.

#### 4. Anti-Robocall Enforcement and Remediation

- Immediate suspension of customers associated with suspected illegal traffic.
- Mandatory secondary review for customers generating unusual calling activity.
- Permanent termination for customers who originate illegal robocalls or violate FCC regulations.
- Preservation of call records, logs, and evidence to support investigations.
- Notification to upstream carriers when a customer is suspended or terminated.

#### 5. 24-Hour Traceback Response Commitment

Cibersys Corp commits to:

- Responding within 24 hours to traceback requests from the FCC, law enforcement, and the Industry Traceback Group.
- Providing complete cooperation, including call details, logs, and customer information.
- Coordinating with upstream carrier traceback teams to resolve investigations swiftly.

#### 6. Upstream Carrier Authentication

As a non-facilities-based provider:

- All outbound calls are sent to interconnected VoIP carriers that fully implement STIR/SHAKEN.
- These carriers authenticate all calls on behalf of Cibersys Corp.
- The company does not operate SIP infrastructure capable of generating or inserting Identity headers.
- This operational structure falls under the FCC exemption outlined in 47 CFR § 64.6304(a)(1).

#### 7. Ongoing Compliance Program

Cibersys Corp maintains continuous compliance measures, including:

- Annual auditing of customer accounts.
- Periodic review of traffic analysis thresholds.
- Updated internal policies to remain consistent with FCC guidance.
- Staff training on illegal robocall prevention.

#### 8. Contact Information

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9. Certification

Cibersys Corp certifies that this Robocall Mitigation Program complies with all requirements under 47 CFR § 64.6305(a) and reflects a robust, enforceable, and continuously monitored framework for preventing illegal robocall activity.