

Xphyre Inc. – Robocall Mitigation Program

Version 1.0

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Company: Xphyre Inc.

Address: 4701 Mesquite Meadow Lane, Katy, Texas 77494

1. Provider Classification

Xphyre Inc. (“Xphyre Telecom”) operates as:

- A Voice Service Provider acting as a wholesale provider originating calls; and
- A Non-Gateway Intermediate Provider transiting SIP traffic between carriers.

Xphyre does not provide end-user retail phone service and is not a gateway provider for foreign-originated traffic.

2. STIR/SHAKEN Deployment Status & Exemption Basis

Xphyre has not yet implemented STIR/SHAKEN because it is in a pre-launch phase and does not originate SIP calls that directly interconnect with the PSTN with full IP authentication capability.

Under 47 CFR § 64.6301(a), STIR/SHAKEN applies only to providers that:

1. Originate SIP calls directly into the PSTN over IP; and
2. Have the technical capability to authenticate caller ID information.

Xphyre does not meet these conditions and qualifies for exemption. Xphyre complies with the Robocall Mitigation Program requirements under 47 CFR § 64.6305.

3. Robocall Mitigation Program Overview

Xphyre maintains a comprehensive Robocall Mitigation Program designed to prevent illegal robocall traffic and ensure rapid cooperation with regulatory entities.

4. Know-Your-Customer (KYC) Procedures

- EIN verification
- Business registration validation

- Website and online presence review
- Contact information verification
- Risk assessment

High-risk customers require additional documentation and certification.

5. Traffic Monitoring & Analytics

Real-time and manual monitoring:

- Call spikes
- Short-duration patterns
- Invalid caller ID usage
- Suspicious call signatures

6. Call Blocking & Enforcement Actions

Escalation steps:

- Immediate remediation
- Suspension of service
- Termination for cause

7. Cooperation With Authorities

Xphyre commits to responding to traceback requests within 24 hours and fully cooperating with FCC, FTC, ITG, and law enforcement.

8. Prevention of Caller ID Spoofing

Only valid, authorized DIDs may be used. Unauthorized calls are blocked.

9. Internal Compliance Controls

- Compliance team oversight
- Routine audits
- Documentation procedures

10. Future STIR/SHAKEN Implementation Plan

Xphyre will implement STIR/SHAKEN after:

- STI-PA onboarding
- Obtaining SPC tokens
- Deploying STIR/SHAKEN on SBCs

11. Certification

Xphyre certifies compliance with 47 CFR § 64.6305 and will update this program as required.