

NajmX LLC

1. OVERVIEW

NajmX LLC maintains a comprehensive robocall mitigation program consistent with **47 CFR § 64.6305(a)**, including reasonable steps to prevent illegal robocalls and a commitment to respond within 24 hours to traceback requests.

2. CUSTOMER ONBOARDING & KYC

- All customers provide business registration documents or government-issued ID
- Service agreements prohibit illegal robocalls, spoofing, and telemarketing violations
- Background checks and review of public business information; records retained for audits

3. CALL MONITORING

- Real-time monitoring of call patterns for high volumes, short durations, rapid dialing, or geographic anomalies
- Automated detection flags suspicious behavior (call rates, answer rates, destinations)
- Continuous review of traffic and daily anomaly reports

4. INVESTIGATION

- Support team investigates flagged calls within 2 hours
- Review account, analyze calls, contact customer, assess compliance, and take action if needed
- All investigations logged with actions and resolution

5. ENFORCEMENT

- Warnings issued for initial violations with 24-48 hour response window
- Call limits or enhanced monitoring for non-compliant customers
- Immediate service suspension for illegal robocalling, spoofing, fraud, TCPA violations, or false info
- Associated DIDs/numbers blocked; upstream providers notified

6. TRACEBACK COMMITMENT

- Full cooperation within 24 hours to FCC, law enforcement, and industry traceback consortium
- Traceback requests logged, investigated, and responded to promptly.
- **Contact:** compliance@najmx.net, 24/7 availability

7. UPSTREAM PROVIDERS & VENDORS

- Monitor provider performance and switch if standards are not met
- Work only with providers who maintain their own robocall mitigation programs.

8. CONTINUOUS IMPROVEMENT

- Review and update procedures regularly based on FCC guidance and industry best practices
- Ongoing training for all staff, specialized training for compliance team

9. RECORD KEEPING

- Maintain records of KYC, call monitoring, investigations, enforcement, and traceback responses
- Retain securely for minimum 2 years; longer if required

10. CERTIFICATION

NajmX LLC certifies that all calls are subject to this mitigation program, reasonable steps are taken to avoid illegal robocalls, we respond within 24 hours to traceback requests, we fully cooperate with FCC, law enforcement, and industry traceback consortium, and investigations and enforcement actions are taken to stop illegal robocallers.