

Nexcom LLC Robocall Mitigation Plan

Last Updated: January, 2026

Introduction

Consistent with the rules and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following Robocall Mitigation Plan (“RMP”) details the policies and practices that Nexcom LLC (“Nexcom” or the “Company”), has established to prevent unlawful robocalls from originating on its voice network.

Nexcom’s RMP details the policies and practices that it has established in its capacity as a voice service provider with a STIR/SHAKEN implementation obligation. Nexcom is not a foreign voice service provider, and its company information, including a list of its affiliates, subsidiaries, parent companies, associated FCC Registration Numbers (“FRNs”), and Operating Company Numbers (“OCN”), is provided as Exhibit A to this RMP. A list of Nexcom’s principals is provided as Exhibit B to this RMP.

Company Summary

Nexcom provides IP-based Cloud voice and data along with other unified communications technologies to small-to-medium sized businesses, predominantly consisting of customers in the health care industry, such as clinics and medical offices. Nexcom does not provide services to call centers or residential customers. Nexcom is based in Roseburg, Oregon.

STIR/SHAKEN Implementation

Consistent with the requirements of the FCC’s Third-Party authentication order, Nexcom has fully implemented the STIR/SHAKEN standard on its network.

Robocall Mitigation Program

Consistent with the FCC’s rules, Nexcom has also implemented a robocall mitigation program, which is designed to prevent, detect, and filter suspected illegal robocalls that are suspected to be originating from the Company’s network. The program includes the following components:

- **Know Your Customer (KYC) for End User Customers and Upstream Providers:** Nexcom has implemented a KYC process to verify the identity of the Company’s new and renewing customers to ensure they are not using Nexcom’s services to originate illegal robocalls. This includes collecting and verifying business information, contact details, and intended use of Nexcom’s services. Further, the Company’s enterprise customers cannot secure Nexcom services through any type of online portal. Instead, and consistent with its KYC practices,

Nexcom only provisions its services to enterprises at the physical locations that the Company's staff have visited.

For its upstream providers, Nexcom has a single upstream provider to facilitate all voice traffic originating from or terminating to the Company's end user customers. The relationship with this established voice provider involves strong contractual terms.

- **Call Analytics:** Working with the Company's single downstream provider Bandwidth, Nexcom leverages their advanced call analytics and traffic monitoring to identify suspicious calling patterns, such as high-volume, short-duration calls, and calls with invalid or unallocated numbers. Coordinating with staff at Bandwidth, Nexcom flags, investigates, and, where appropriate, blocks such calls in real-time.
- **Blacklisting and Whitelisting:** Nexcom maintains and regularly updates blacklists of known robocallers and fraudulent numbers. Nexcom also offers whitelisting services to our customers to ensure that legitimate calls are not inadvertently blocked.
- **Traceback Cooperation:** Nexcom commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.
- **Company Investigations:** Nexcom provides our customers with easy-to-use tools to report unwanted and illegal robocalls. Nexcom investigates all complaints from customers, the Company's single downstream provider (Bandwidth), and the FCC's Traceback Consortium, among others. Upon notification of suspected illegal robocall traffic, Nexcom takes appropriate action, which may include blocking numbers, terminating service, and reporting offenders to the relevant authorities.
- **Customer Agreements:** Nexcom maintains agreements with each of its end user customers. Nexcom's agreements permit it to terminate any end user customer for any reason.

Designated Employee Responsible for Addressing Robocall Mitigation-Related Issues

The name, title, department, business address, telephone number, and email address of the person within Nexcom responsible for addressing robocall mitigation-related issues, to include traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies, is as follows:

Contact Name: Josh Burdett
Contact Department: Information Technology
Contact Title: IT Department
Contact Street: 1224 Walnut St.
Contact City, State, and Zip Code: Roseburg, Oregon, 97470

Contact Telephone Number: (541) 464-4000
Contact Email: Support@nexcomnetworks.com

Compliance and Certification

Nexcom was the subject of formal Commission enforcement action regarding its Robocall Mitigation Database certification. In its capacity as a voice service provider, Nexcom was removed from the RMD on August 6, 2025, following issuance of an Order by the FCC's Enforcement Bureau Order (DA 25-694) ("RMD Order").

Consistent with the requirements outlined in the RMD Order, Nexcom requested reinstatement to the RMD on November 13, 2025, and was directed to resubmit its RMP through the RMD portal, subject to review and approval by the Enforcement Bureau and the Wireline Competition Bureau. See RMD Order, ¶ 14; see *also*, RMDReinstatementRequest@fcc.gov, Email to Kevin G. Rupy, Counsel for Nexcom LLC (Nov. 13, 2025, "Re: RMD Reinstatement; RMD Number RMD0008841") ("*FCC RMD Email*").

Consistent with the *FCC RMD Email*, Nexcom LLC has filed its robocall mitigation certification and updated RMP with the FCC and will continue to update it as required. We are committed to complying with all applicable federal and state regulations related to robocalling and telemarketing.

Exhibit A
Company Information

Company Name	DBAs & Former Business Names	FRNs	OCN
Nexcom LLC	Nexcom	0031445315 0024368128	

Exhibit B
Company Principals

Name	Position
Bob Miller	Founder/President
Jim Sperlich	Project Manager
Josh Burdett	IT Director