

Robocall Mitigation Program Description

FCC Robocall Mitigation Database (RMD) Filing — Arxyn Inc.

This document is intended to be uploaded to the FCC Robocall Mitigation Database (RMD).

RMD portal: <https://fccprod.servicenowservices.com/rmd> | Filing instructions (May 2025):

<https://www.fcc.gov/sites/default/files/rmd-instructions.pdf>

1) Filing Entity / Identifiers

Legal Business Name: Arxyn Inc.

Entity Type: Private Sector – Corporation

FRN: 0037796125

EIN: 993004841

Business Address: 14 E 5th Street, Huntington Station, NY 11746, USA

2) Robocall Mitigation Contact (24/7)

Robocall Mitigation Officer: Milton D. Aguilar, CEO/President

24/7 Traceback Contact Email: traceback@arxyn.com

24/7 Traceback Contact Phone: 631-464-0100

3) Provider Type / Services

Arxyn Inc. is a **Voice Service Provider** that originates calls for **end-user customers** (not a wholesale provider).

Initial upstream/vendor route for PSTN connectivity: **AWS Chime Voice Connector**.

4) STIR/SHAKEN Status

Current status: **Full STIR/SHAKEN implementation — production signing active**.

- The ARXYN Connect voice platform implements STIR/SHAKEN signing logic and enforces outbound compliance controls.
- Production STI certificate issued by Telonium STI-CA (authorized via STI-PA / iconectiv; account ID **102929**, OCN **022M**).
- Outbound calls are signed with ES256 PASSporT tokens per ATIS-1000074; the public certificate chain is hosted at the platform's stable x5u URL (connect-api.arxyn.com/storage/v1/object/public/stir-shaken/certs/sti.pem).
- Signing is enforced fail-closed (STIR_SHAKEN_REQUIRE_ATTEST=true) for all outbound PSTN transfers.

5) Robocall Mitigation Program (47 CFR § 64.6305(a))

All calls originated on our network are subject to a robocall mitigation program consistent with **47 CFR § 64.6305(a)**, including reasonable steps to avoid originating illegal robocall traffic. Measures include:

- **Customer onboarding and business verification (KYB)** appropriate to service risk
- **Telephone number authorization and verification** prior to outbound origination
- **Policy enforcement controls** for outbound calling (including administrative approval workflow and audit logging)
- **Rate limiting / volume controls** and automated blocking policies where applicable
- **Do-Not-Originate (DNO) blocking** per 47 CFR § 64.1200(o): inbound calls are screened at the SIP edge against invalid NANP formats, unallocated NPA-NXX codes (NANPA data), and curated inbound-only numbers; outbound caller ID is restricted to tenant-verified telephone numbers via the platform's TN authorization system
- **Logging, monitoring, and investigation workflows** for suspected abuse

6) Traceback Commitment / Cooperation

Arxyn commits to respond fully and within **24 hours** to traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate in investigating and stopping illegal robocallers using our service. We maintain an internal on-call process to monitor and respond via the 24/7 contact listed above.

7) Enforcement

If illegal robocall activity is suspected or confirmed, Arxyn will take enforcement action up to and including suspension or termination of service, and will retain records necessary to support investigations and traceback.

8) Recordkeeping

Arxyn retains call detail records and relevant audit logs sufficient to support traceback responses and compliance investigations consistent with business and legal requirements.

Declaration

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signed: Milton D. Aguilar

Title: CEO/President, Arxyn Inc.

Date: 2026-02-23