

Robocall Mitigation Program — 4x Technologies, LLC

Role(s) in Call Path: Reseller / Originating Provider via underlying platform (SkySwitch)

Purpose

This document outlines 4x Technologies' robocall mitigation program, describing the reasonable steps we take to reduce the origination of illegal robocalls, ensure customer compliance, and cooperate with traceback and enforcement efforts.

1. Overview

4x Technologies provides business voice services to authorized commercial customers. Our program is designed to:

- Identify and prevent unlawful robocalling activity
 - Respond promptly to complaints and traceback requests
 - Enforce appropriate restrictions, up to and including service termination for noncompliant customers
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2. Platform-Level Controls (SkySwitch)

As a reseller, 4x Technologies relies on SkySwitch for call origination and termination. SkySwitch applies platform-level controls, which are incorporated into our program:

- Real-time monitoring of outbound traffic for suspected illegal robocalls
- Alerts and reporting for calls using invalid, unallocated, or unauthorized numbers
- Investigation of flagged traffic, with escalation to warnings or service termination as needed
- Blocking of calls with invalid DIDs from leaving the network, except for emergency calls

STIR/SHAKEN Implementation (Option 3):

All voice traffic originating from 4x Technologies is STIR/SHAKEN authenticated or verified by our upstream providers in compliance with FCC requirements.

4x Technologies coordinates closely with SkySwitch during investigations and enforcement actions whenever suspicious activity is detected.

3. 4x Technologies Controls (Reasonable Steps)

3.1 Customer Vetting and Authorized Use

- Verify the identity and legitimacy of all new commercial customers (business name, physical address, authorized representatives, jurisdiction of incorporation, and business type)
- Prohibit illegal robocalls, unlawful caller ID spoofing, and require compliance with applicable laws in all customer agreements

3.2 Caller ID and Numbering Controls

- Require customers to use only authorized caller ID numbers associated with their service
- Investigate and act on attempts to use invalid, unallocated, or unauthorized caller IDs in coordination with SkySwitch

3.3 Monitoring, Investigation, and Enforcement

- Review calling patterns and complaints for indicators of illegal robocalling
- Investigate promptly and document all actions taken
- Take corrective measures, including warnings, traffic restrictions, service suspension, or termination when illegal activity is confirmed

3.4 Complaint Intake

- Accept robocall-related complaints from customers, carriers, and consumers
- Respond promptly via designated support channels (email, phone)

4. Traceback Cooperation

4x Technologies cooperates fully with law enforcement, the FCC, and the Industry Traceback Group. Traceback requests are addressed promptly, typically within 24 hours, to help identify and stop illegal robocall campaigns.

5. Program Governance and Updates

- The program is reviewed periodically and updated as needed to reflect regulatory requirements and observed trends in abusive behavior

- Updates to robocall mitigation contact information or program procedures are filed with the FCC promptly