

Robocall Mitigation Plan

Company Name: Xecunet LLC

FCC Registration Number (FRN): 0024296980

Business Type: Voice Service Reseller and Hosted Phone System Provider

Date Implemented: 1/29/2026

Last Updated: 1/29/2026

1. Purpose

Xecunet LLC has implemented this Robocall Mitigation Plan to prevent the origination and transmission of illegal robocalls in accordance with 47 CFR §64.6305. Xecunet LLC does not knowingly originate, facilitate, or tolerate illegal robocalls, including scam, fraudulent, or abusive calling activity.

2. Company Classification

Xecunet LLC is **not a facilities-based voice service provider**.

Xecunet LLC operates as a **voice service reseller and hosted phone system provider**, offering cloud-based phone systems and related voice services to customers by reselling services obtained from the following upstream providers:

- **SIPtrunk.com**
- **Flowroute**
- **Altigen**

Xecunet LLC does not own or operate PSTN switching infrastructure and does not directly control numbering resources.

3. STIR/SHAKEN Implementation & Justification

Xecunet LLC does **not directly implement STIR/SHAKEN** because it does not originate calls on its own facilities and does not have the technical capability to sign calls at the network level.

- Calls placed using Xecunet LLC's hosted phone systems and reseller services are transmitted through upstream providers that implement STIR/SHAKEN authentication and verification.

- SIPtrunk.com and Flowroute perform call signing consistent with their STIR/SHAKEN policies and FCC requirements.
- Xecunet LLC coordinates with its upstream providers to ensure reasonable compliance with STIR/SHAKEN obligations.

This approach is consistent with FCC guidance permitting non-facilities-based providers, including resellers and hosted service providers, to rely on upstream providers for STIR/SHAKEN implementation where direct signing is not technically feasible.

4. Reasonable Robocall Mitigation Measures

Xecunet LLC has implemented reasonable and effective measures to mitigate illegal robocalls, including the following:

a. Customer Due Diligence

Prior to enabling voice services or hosted phone systems, Xecunet LLC conducts reasonable vetting, which may include:

- Verification of customer identity and business legitimacy
- Review of intended use of voice services and calling features
- Confirmation that customers are authorized to use any Caller ID numbers presented

High-risk or high-volume outbound calling use cases are subject to enhanced scrutiny and may be restricted or denied.

b. Acceptable Use Enforcement

Xecunet LLC prohibits the use of its reseller services and hosted phone systems for:

- Illegal robocalls
- Scam, phishing, or fraudulent activity
- Unauthorized or deceptive Caller ID spoofing
- Calls made without legally required consumer consent

Violations may result in immediate suspension or termination of service.

c. Monitoring and Abuse Detection

Xecunet LLC monitors customer usage within its hosted phone systems and coordinates with upstream providers to identify potentially illegal or abusive traffic, including:

- Excessive outbound call volumes
 - Short-duration or anomalous calling patterns
 - Complaints received from carriers, consumers, or regulators
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5. Response to Suspected Illegal Robocalls

Upon detection or notification of suspected illegal robocall activity, Xecunet LLC takes prompt and appropriate action, which may include:

- Investigation of the relevant customer or hosted system
- Blocking or suspension of specific numbers, extensions, or services
- Termination of customers engaged in confirmed violations
- Coordination with upstream providers to prevent further transmission

All mitigation actions are documented internally.

6. Traceback Cooperation

Xecunet LLC:

- Responds promptly to traceback requests from the FCC, law enforcement, or the Industry Traceback Group (ITG)
 - Maintains sufficient customer and call detail records to support traceback investigations
 - Coordinates with SIPtrunk.com and Flowroute as necessary to assist with traceback efforts
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7. Caller ID Authorization

- Customers using Xecunet LLC's hosted phone systems and reseller services must be authorized to use all Caller ID numbers presented.

- Unauthorized or misleading Caller ID usage is prohibited.
 - Numbers associated with illegal activity may be blocked or removed from service.
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8. Ongoing Review

Xecunet LLC reviews and updates this Robocall Mitigation Plan as necessary to ensure continued compliance with FCC rules, enforcement guidance, and operational changes.

9. Contact Information

Robocall Mitigation Contact:

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