

Robocall Mitigation Program Description

Playa Business Solutions, Inc FCC Robocall Mitigation Database Filing Date: February 11, 2026

1. Company Overview and Role in the Call Chain

Playa Business Solutions, Inc is a **white-label reseller** of hosted voice communications services provided by **SkySwitch**, a managed UCaaS / hosted PBX platform provider. We offer cloud-based VoIP telephone service, including voice calling, to end-user business and residential customers under our own brand.

We **do not**:

- Own, operate, or control switching infrastructure, Session Border Controllers (SBCs), or direct interconnections to the Public Switched Telephone Network (PSTN) for call origination.
- Originate calls directly to the PSTN ourselves.
- Have the technical capability or contractual authority to implement STIR/SHAKEN caller ID authentication on our own.

All outbound calls to the PSTN are routed through and originated by **SkySwitch's network infrastructure**. SkySwitch (or its upstream carriers) handles call origination and applies STIR/SHAKEN authentication, assigning appropriate attestation levels in accordance with 47 CFR § 64.6301. We therefore have **no STIR/SHAKEN implementation obligation** under FCC rules, as we lack control over the network infrastructure necessary to perform authentication (consistent with FCC interpretations of 47 CFR § 64.6301).

2. Robocall Mitigation Program – Reasonable Steps to Avoid Originating Illegal Robocall Traffic

Pursuant to 47 CFR § 64.6305(a), we have implemented and maintain an appropriate robocall mitigation program with the following **reasonable steps** to prevent our service from being used to originate illegal robocall traffic:

A. Customer Onboarding and Know-Your-Customer (KYC) Procedures

- All prospective customers complete a detailed application process that includes identity verification, business purpose disclosure, and intended use of the service.
- We prohibit high-risk or suspicious activities (e.g., mass unsolicited marketing calls, political robocalls without consent, debt collection without proper licensing) in our Terms of Service and Acceptable Use Policy.
- We conduct enhanced due diligence on customers who request high call volumes, international calling, or call center-type features.

B. Contractual and Policy Prohibitions

- Our customer agreements and Terms of Service explicitly **prohibit** the origination or transmission of illegal robocalls, including calls made in violation of the TCPA, Do Not Call rules, truth-in-calling requirements, or any other applicable law.
- Violations of these prohibitions constitute grounds for immediate suspension or termination of service.

C. Call Pattern Monitoring and Abuse Detection

- We monitor customer account activity for unusual patterns, including sudden high-volume calling, short-duration calls, repetitive calling to the same numbers, or other indicators commonly associated with illegal robocalling.
- Automated alerts and manual reviews are used to identify potential abuse.
- We block or restrict features (e.g., outbound international calling) for accounts exhibiting suspicious behavior pending investigation.

D. Response to Complaints and Traceback Requests

- We commit to respond **fully and within 24 hours** to all traceback requests received from the FCC, law enforcement agencies, and the industry traceback consortium (e.g., Industry Traceback Group).
- We cooperate fully with these entities in investigating and stopping any illegal robocallers using our service.
- We maintain records of traceback responses and mitigation actions for compliance review.

E. Customer Education and Ongoing Compliance

- We provide customers with information about lawful calling practices and the consequences of illegal robocalling.
- We actively review and update our policies to align with evolving FCC rules and industry best practices.

3. Reliance on Upstream Provider (SkySwitch)

Because we do not originate calls to the PSTN, we rely on SkySwitch to:

- Implement STIR/SHAKEN authentication on all outbound calls.
- Perform network-level blocking of known illegal traffic where possible.
- Cooperate with tracebacks and mitigation efforts upstream.

We actively communicate with SkySwitch regarding any suspected abuse involving our customers and support their mitigation actions.

4. Certification and Ongoing Compliance

We certify that:

- This robocall mitigation program is actively implemented and reasonably designed to prevent the origination of illegal robocall traffic.
- We will update this program and our RMD filing promptly if our practices or role in the call chain change.
- We understand that failure to maintain an effective mitigation program or to respond timely to tracebacks may result in removal from the Robocall Mitigation Database and downstream blocking.

This program is reviewed and updated as needed to reflect changes in FCC requirements or our operations.

Tom Voss
President
Playa Business Solutions
Date: February 11, 2026