

# TrueCloud PBX

## Robocall Prevention, Detection & Mitigation Program

Effective Date: 02/26/2026

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### 1. Purpose

TrueCloud PBX is committed to preventing, detecting, and mitigating illegal robocalls across our network. Our program ensures compliance with applicable federal regulations and industry standards.

Our mitigation framework is designed to protect consumers, maintain network integrity, prevent abuse by bad actors, comply with STIR/SHAKEN requirements, support traceback investigations, and quickly remediate suspicious traffic.

### 2. Platform Infrastructure & Current Carrier Relationship

TrueCloud PBX currently operates utilizing the SkySwitch Calling Platform as our underlying infrastructure provider.

At this time, all DID numbers are provisioned and managed through SkySwitch. TrueCloud PBX does not have direct access to or direct control over telephone number inventory. STIR/SHAKEN authentication certificates are managed at the platform level through SkySwitch and its upstream carrier relationships.

- DIDs are provisioned via SkySwitch.
- Certificate governance is handled at the platform level.
- Attestation levels are applied within the hosted environment.

### Future Infrastructure Transition

TrueCloud PBX is planning a transition away from the SkySwitch platform. Upon completion, TrueCloud PBX will obtain and manage its own SPC tokens and STIR/SHAKEN certificates, independently manage attestation levels, and assume full operational responsibility for DID inventory and origination controls.

### 3. Governance & Compliance Framework

- Designated Robocall Mitigation Program Manager
- Internal compliance documentation and enforcement policies
- Annual program review
- Cooperation with traceback initiatives
- Registration in the FCC Robocall Mitigation Database (as applicable)

#### **4. Know Your Customer (KYC) & Customer Vetting**

- Business registration verification
- EIN or Tax ID confirmation (for business accounts)
- Physical address validation
- Government-issued ID for sole proprietors
- Review of intended use case and expected call volume
- Enhanced screening for high-volume outbound callers

#### **5. Traffic Monitoring & Analytics**

- Monitoring of high call velocity
- Short-duration call detection
- Sequential dialing pattern analysis
- High complaint-to-call ratio alerts
- Call Detail Record (CDR) retention and analysis

#### **6. Complaint Intake & Investigation**

- CDR-based traffic identification
- Customer explanation request
- Opt-in documentation review (if applicable)
- Temporary traffic restriction during investigation
- Immediate suspension if illegal activity is suspected

#### **7. Industry Traceback Cooperation**

TrueCloud PBX cooperates with industry traceback groups, upstream carriers, and law enforcement agencies when required. We respond promptly to traceback requests and provide relevant call origination data within the scope of our operational control.

## **8. Mitigation & Enforcement**

- Immediate outbound traffic blocking
- Concurrency reduction
- DID revocation
- Account termination for violations
- Zero-tolerance policy toward illegal robocalling

## **Statement of Commitment**

TrueCloud PBX is committed to preventing illegal robocalls, protecting consumers, and maintaining a compliant telecommunications environment. Our upcoming infrastructure transition will further strengthen authentication, oversight, and compliance controls.