

Spex Telecom Services, LLC **Robocall Mitigation Program**

Spex Telecom Services, LLC (referred to herein as the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

Spex Telecom Services, LLC is a reseller of **PayG LLC dba SkySwitch (RMD0002940)** Hosted VoIP and does not have the capability to implement STIR/SHAKEN. However, our upstream provider, PayG LLC dba SkySwitch, has implemented STIR/SHAKEN protocols in its IP Voice networks.

Spex Telecom Services, LLC has not been prohibited from filing a certification in the Robocall Mitigation Database.

Spex Telecom Services, LLC, including all its executives and principals, has no history of enforcement actions related to illegal robocalls, violations of the Telephone Consumer Protection Act (TCPA), Telemarketing Sales Rule (TSR), or related state laws.

Know Your Customer (KYC) Protocols

To prevent the origination of illegal traffic, Spex Telecom Services, LLC employs a multi-layered **Know Your Customer (KYC)** protocol. All new customers undergo a rigorous verification process before gaining full-service access. This process involves a combination of electronic and manual verification systems, credit reviews, reference checks from trusted industry members, and evaluation of previous experiences with customer executives and employees. Spex Telecom Services, LLC severely limits the capabilities of new accounts until these comprehensive vetting processes are successfully completed.

Traceback

Spex Telecom Services, LLC responds within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperates with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Traffic Monitoring

Spex Telecom Services, LLC relies on software provided by PayG LLC dba SkySwitch to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls. Our solution features:

- **Fraud Detection:** Detection of high-volume robocalling, spoofing, and spam call activity.
- **Subscriber Notification:** Caller ID Name override to warn subscribers of suspicious calls.
- **Call Blocking Support:** Accurate identification, enabling you to block fraudulent phone calls as per the TRACED Act.
- **Business Number Verification:** Register legitimate business numbers to prevent unintentional call blocking.
- **Caller ID Name Service:** Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when the call is determined fraudulent.
- **Do Not Call Registry:** We comply with the FTC's rules for the Do Not Call Registry.
- **Do Not Originate:** We block calls based on a reasonable do-not-call list per FCC guidelines.

Hosted VoIP Upstream Provider Platform

Spex Telecom Services, LLC has made sure to verify that the companies relied upon for upstream traffic are following FCC RMD regulations. Upstream providers are as follows:

PayG, LLC dba SkySwitch (RMD0002940)

Address: Arborcrest 1, 751 Arbor Way, Suite 150, Blue Bell, PA 19422

Phone: 747-777-8100

Email Address: support@skyswitch

Indemnification

Customer shall indemnify, defend, and hold harmless Spex Telecom Services, LLC, its officers, agents, and affiliates from and against any claims, fines, penalties, investigations, or damages arising out of Customer's unlawful use of the Services.

Right To Refuse and Block Traffic

Spex Telecom Services, LLC reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or are not authorized to use has occurred or is suspected. Spex Telecom Services, LLC can block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number, or spoofed origination number transiting the Company's networks.