

Robocall Mitigation Plan: Nexra LLC

1. Introduction Nexra LLC ("Nexra") is a Voice Service Provider (VSP) providing interconnected VoIP services. Nexra operates as a white-label reseller through an upstream partnership with SkySwitch. Nexra is committed to preventing the origination of illegal robocalls on its network and fully complies with 47 CFR § 64.6305(d).

2. Know Your Customer (KYC) Procedures Nexra employs a strict manual vetting process for all new customers to ensure they are legitimate businesses.

- **Direct Engagement:** Nexra does not offer automated self-service signups. Every customer must undergo a personal consultation with a Nexra representative to discuss their specific business needs and intended use of the platform.
- **Business Verification:** Nexra verifies the identity of each business, including its physical location and the nature of its operations, prior to service activation.
- **High-Risk Exclusion:** Nexra does not target or provide services to high-risk industries such as third-party telemarketing, lead generation, or high-volume automated dialing services.

3. Product Safeguards Nexra's product suite is designed for standard business communications (PBX/UCaaS).

- Nexra does not offer "robocalling" tools, such as auto-dialers, mass-broadcast messaging, or "neighborhood" spoofing features.
- Customer usage is monitored for patterns inconsistent with standard business use.

4. Upstream Provider Integration & STIR/SHAKEN As a reseller, Nexra lacks the direct network infrastructure to implement STIR/SHAKEN internally.

- Nexra relies on its upstream provider, SkySwitch, to perform call authentication and STIR/SHAKEN signing on behalf of Nexra's customers.
- Nexra monitors upstream alerts to identify and mitigate any suspicious traffic patterns originating from its client base.

5. Traceback Cooperation & Enforcement Nexra fully cooperates with the Industry Traceback Group (ITG), the FCC, and law enforcement.

- **Response Commitment:** Nexra commits to responding to all traceback requests within 24 hours of receipt.

- **Termination Policy:** Nexra's Terms of Service strictly prohibit the use of its service for illegal robocalling or deceptive caller ID spoofing. Any customer found to be in violation is subject to immediate service suspension or termination.