

ROBOCALL MITIGATION PLAN

NEXRYTHM LLC

Company Information

Item	Details
Company Name	Nexrythm LLC
FRN	0038115242
FCC Form 499 Filer ID	838712
Principal Operating Address	1500 N GRANT ST #10064, DENVER, CO, 80203, USA
Website	www.Nexrythm.com
Owner / Compliance Contact	MUZAFAR ALI
Email	support@Nexrythm.com

1. STIR/SHAKEN Implementation Status

Nexrythm LLC has successfully implemented STIR/SHAKEN in compliance with applicable FCC regulatory requirements. The company is authorized to sign outbound calls using a valid STIR/SHAKEN certificate and follows ATIS standards and STI-GA policies.

Nexrythm LLC continuously maintains and monitors its STIR/SHAKEN framework to ensure proper call authentication, attestation accuracy, and compliance with industry best practices.

Attestation Framework

A-Level (Full Attestation)

Applied when Nexrythm LLC:

- Has a direct contractual relationship with the calling customer;
- Has validated the customer's identity; and
- Has verified authorization to use the displayed telephone number.

B-Level (Partial Attestation)

Applied when:

- The source provider can be authenticated; however,
- Independent verification of the caller's authorization to use the presented number cannot be fully confirmed.

This typically applies to trusted wholesale partners.

C-Level (Gateway Attestation)

Applied when:

- Calls enter the network from sources that cannot be fully authenticated; or
- Caller identity verification is unavailable.

Unsigned Traffic Review

Traffic received without a STIR/SHAKEN signature is subject to enhanced compliance review and fraud monitoring. Suspicious traffic may be restricted, quarantined, blocked, or further investigated before routing.

2. Business Model & Network Role

Nexrythm LLC participates in the telecommunications ecosystem in two primary capacities:

Wholesale Services

Providing voice termination and interconnection services to:

- Carrier partners
- Resellers
- Telecommunications providers

Direct Customer Services

Providing telecommunications services directly to retail and business customers originating traffic through the company's network and platform.

Estimated Traffic Distribution

Traffic Type	Percentage
Direct End-User Traffic	5% – 7%

Traffic Type	Percentage
Wholesale & Reseller Traffic	90% – 95%

3. Robocall Mitigation Program

Nexrythm LLC takes affirmative and effective measures to prevent its network from being used to originate illegal robocalls.

3.1 Know Your Customer (KYC) Procedures

- Identity verification of all customers prior to service activation.
 - Collection of valid government identification.
 - Collection of business registration records.
 - Collection of tax identification documentation.
 - Verification of authorized representatives.
 - Risk-based customer onboarding and screening.
 - Enhanced due diligence for high-risk industries including:
 - Debt recovery
 - Lead generation
 - Healthcare communications
 - Political outreach
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3.2 Traffic Monitoring & Analytics

Nexrythm LLC continuously monitors inbound and outbound traffic using automated and manual review processes.

Monitoring includes:

- High-volume traffic spikes
- Short-duration call activity
- Sequential dialing patterns
- Auto-dialing behavior
- Completion-rate anomalies
- Other suspicious traffic indicators

Automated alerts are generated whenever unusual activity is detected.

3.3 Call Blocking & Filtering

The company utilizes automated fraud detection and filtering systems to:

- Block suspicious traffic;
- Prevent spoofed calling activity;
- Restrict calls with suspicious caller ID information; and
- Act upon STIR/SHAKEN verification warnings.

Traffic may be blocked, rejected, isolated, or investigated when warranted.

3.4 Do-Not-Originate (DNO) Protection

Nexrythm LLC maintains protections against caller ID spoofing and invalid number usage through:

- Industry-standard Do-Not-Originate (DNO) lists;
 - Internal risk databases; and
 - Blocking of invalid, unallocated, or spoofed telephone numbers.
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3.5 Traceback Cooperation

Nexrythm LLC fully cooperates with traceback efforts and industry partners, including the U.S. Telecom Industry Traceback Group.

Traceback Procedures

- Responses to traceback requests within 24 hours or within the applicable regulatory timeframe.
 - Investigation of the traffic source and associated customer account.
 - Retention of traceback records for a minimum of two (2) years.
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3.6 Upstream Provider Compliance

Nexrythm LLC works only with reputable and compliant upstream providers.

Preference is given to carriers that:

- Have implemented STIR/SHAKEN; and
 - Maintain strong robocall mitigation and compliance programs.
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3.7 Downstream Customer Enforcement & TCPA Controls

All customers must comply with:

- Telephone Consumer Protection Act (TCPA)
- Telemarketing Sales Rule (TSR)
- Federal and State Do-Not-Call requirements
- Company Terms of Service
- Acceptable Use Policy

Additional controls include:

- Consent documentation requirements for outbound campaigns when applicable.
 - Continuous monitoring of customer traffic.
 - Immediate investigation of suspicious activity.
 - Immediate suspension or permanent termination for policy violations.
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3.8 Record Retention

Nexrhythm LLC maintains:

- Call Detail Records (CDRs)
- Traffic monitoring logs
- Customer compliance records

Records are retained for a minimum of two (2) years and are available for regulatory or traceback purposes upon request.

3.9 Regulatory Compliance

Nexrhythm LLC complies with all applicable regulations related to robocall mitigation, including:

- FCC Robocall Mitigation Requirements
 - Telephone Consumer Protection Act (TCPA)
 - Telemarketing Sales Rule (TSR)
 - Federal and State Do-Not-Call Requirements
 - Applicable STIR/SHAKEN Obligations
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4. Network Security & Traffic Controls

To maintain network integrity and minimize abuse, Nexrhythm LLC employs multiple monitoring, fraud detection, and enforcement mechanisms.

Where policy violations are identified:

- Services may be suspended immediately;
 - Traffic may be blocked or restricted; and
 - Accounts may be permanently terminated depending on the severity of the violation.
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5. Management & Public Presence

Nexrythm LLC is a privately owned telecommunications company.

MUZAFAR ALI serves as the Owner and primary point of contact for:

- Compliance
- Operations
- Carrier Relations
- Regulatory Matters

Management remains directly accessible and actively involved in day-to-day operations and compliance oversight.

The company continues to expand its public business presence and professional profiles across relevant industry platforms. Government-issued identification of the owner has been provided where required to support carrier due diligence and compliance reviews.

Submitted By

MUZAFAR ALI

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