

Robocall Mitigation Program Description

TDX Voice

Prepared pursuant to 47 CFR § 64.6305(d) | Date: March 27, 2026

1. Provider Overview

Business Name: TDX Voice

Business Address: PO Box 3206, Ogden, UT 84409

Robocall Mitigation Contact: Aaron Spurlock, President, IT Department

FCC Registration Number (FRN): 0038217998

TDX Voice is a small, U.S.-based domestic Voice Service Provider offering managed VoIP telephone services to small business end-users. TDX Voice provisions, configures, and manages hosted 3CX PBX instances on behalf of its clients, utilizing SIP trunking carriers for call origination and termination. TDX Voice serves end-users directly and does not operate as a wholesale or gateway provider.

2. Role in the Call Chain

TDX Voice operates as a Voice Service Provider serving end-user small businesses. TDX Voice's clients are small businesses that use TDX Voice's managed PBX service for ordinary business telephony, including inbound and outbound calls to customers, vendors, and business associates. TDX Voice does not originate calls on behalf of third-party aggregators, telemarketers, or mass-calling enterprises.

Call origination infrastructure is provided by TDX Voice's upstream SIP trunking carriers. TDX Voice does not independently operate the originating network infrastructure necessary to implement STIR/SHAKEN call authentication. STIR/SHAKEN signing is performed at the upstream carrier level pursuant to 47 CFR § 64.6301. TDX Voice accordingly certifies under Option 3 (No STIR/SHAKEN Implementation on its own network).

Rule providing exemption: TDX Voice relies on its upstream SIP carriers for STIR/SHAKEN origination signing. As a hosted PBX manager and VSP without direct control over the originating carrier network, TDX Voice does not independently implement STIR/SHAKEN on any portion of its network. All calls originate through carriers that maintain their own STIR/SHAKEN obligations.

3. Steps Taken to Avoid Originating Illegal Robocall Traffic

TDX Voice implements the following measures as part of its robocall mitigation program, consistent with 47 CFR § 64.6305(a):

- **Client Vetting:** TDX Voice serves a small, known base of small business clients. Prior to provisioning service, TDX Voice verifies the legitimacy of prospective clients, including confirming the nature of their business operations. TDX Voice does not onboard clients whose stated use case involves unsolicited outbound calling, telemarketing, or robocalling.

- **End-User Nature of Traffic:** All client businesses served by TDX Voice use telephone service for ordinary business communications — inbound customer calls, outbound calls to known business contacts, and internal communications. None of TDX Voice's clients make unsolicited outbound automated or mass calls to consumers.
- **Service Monitoring:** TDX Voice actively monitors client PBX systems as part of its managed service offering. Unusual call volume patterns or anomalous outbound call behavior would be identified through this ongoing management relationship and addressed promptly.
- **Contractual Prohibitions:** TDX Voice's service agreements prohibit clients from using TDX Voice's platform to originate illegal robocalls, spoofed calls, or any calls in violation of the Telephone Consumer Protection Act (TCPA) or FCC rules. Violations are grounds for immediate service termination.
- **Upstream Carrier Accountability:** TDX Voice utilizes reputable SIP trunking carriers that maintain their own STIR/SHAKEN implementation and robocall mitigation obligations. TDX Voice selects carriers that are registered in the Robocall Mitigation Database and in good standing with the FCC.
- **Security Practices:** TDX Voice implements technical controls on hosted PBX instances to prevent unauthorized use, including authentication requirements, access controls, and monitoring for unauthorized call activity that could indicate compromise or abuse of the platform.

4. Traceback Cooperation Commitment

TDX Voice commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (USTelecom's Industry Traceback Group or its successor). TDX Voice will cooperate fully with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

The designated point of contact for traceback requests and robocall mitigation inquiries is:

Aaron Spurlock, President
TDX Voice
PO Box 3206, Ogden, UT 84409

5. Principals, Affiliates, Subsidiaries, and Parent Companies

TDX Voice has no principals, affiliates, subsidiaries, or parent companies to disclose.

6. Prior Government Actions or Investigations

TDX Voice has not, at any time in the prior two years, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal

robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

7. Certification

TDX Voice certifies that all of the calls that it originates on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a), which shall include reasonable steps to avoid originating illegal robocall traffic and shall include a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. TDX Voice further certifies that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission, and that it has not implemented the STIR/SHAKEN authentication framework on any portion of its network.

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Officer e-Signature: Aaron Spurlock

Title: President, TDX Voice

Date: March 27, 2026