

Robocall Mitigation Program 3CX Solutions Date: April 2026

1. Company Overview 3CX Solutions is a reseller of VoIP services to end-user customers. We provide hosted VoIP solutions based on the 3CX Phone System platform. We do not own, operate, or control any underlying voice network infrastructure, switching facilities, or transmission facilities. All call origination, routing, and technical handling is performed by our upstream wholesale VoIP providers.

2. STIR/SHAKEN Implementation Status 3CX Solutions has no STIR/SHAKEN implementation obligation. We rely entirely on our upstream wholesale providers for call origination, routing, and STIR/SHAKEN caller ID authentication. This qualifies us for the exemption under **47 CFR § 64.6304** and related FCC Orders, as we do not have the facilities necessary to implement STIR/SHAKEN ourselves.

3. Robocall Mitigation Program – Reasonable Steps Pursuant to 47 CFR § 64.6305, 3CX Solutions implements the following reasonable steps to avoid originating illegal robocall traffic:

- **Know Your Customer (KYC) Procedures:** Before activating service for any new customer, we collect and review business documentation, government-issued identification of the principal(s), and other information to verify the customer's legitimate business purpose. We do not activate service until this due diligence is satisfactorily completed.
- **Contractual Protections:** All customer agreements explicitly prohibit the use of our service for illegal robocalling, spoofing, or any violation of FCC rules. We reserve the right to immediately suspend or terminate service if any violation is suspected or confirmed.
- **Traffic Monitoring:** We monitor customer usage patterns for red flags commonly associated with illegal robocalls, such as unusually high volumes of short-duration calls or other suspicious calling behavior. When potential issues are detected, we investigate promptly and take corrective action, which may include customer contact, temporary suspension, or permanent termination of service.
- **Upstream Provider Vetting:** We only partner with upstream wholesale VoIP providers that maintain a valid and current filing in the FCC Robocall Mitigation Database.

4. Traceback Response Commitment We commit to responding fully and completely to all traceback requests from the FCC, law enforcement agencies, or the Industry Traceback Group (ITG) **within 24 hours** of receipt. We will cooperate fully with any investigation aimed at identifying and stopping illegal robocallers using our service.

5. Ongoing Compliance We will review and update this Robocall Mitigation Program as needed. Any material changes will be reflected in an updated RMD filing within 10 business days. We will recertify our RMD filing annually as required by the FCC.

This Robocall Mitigation Program satisfies the requirements of 47 CFR § 64.6305 for voice service providers.

