

Robocall Mitigation Program Description

TelecomsXChange Canada Inc. (TCXC)

TelecomsXChange Canada Inc. ("TCXC") certifies that all voice traffic carried or processed on its network is subject to a robust robocall mitigation program consistent with the requirements of 47 CFR § 64.6305(c). This program includes the following measures:

- 1 Reasonable steps to avoid originating, carrying, or processing illegal robocall traffic across the TCXC platform.
- 2 A commitment to respond fully and in good faith, within 24 hours, to all traceback requests received from the Federal Communications Commission, law enforcement agencies, and the Industry Traceback Group (ITG).
- 3 Full cooperation with the Commission, law enforcement, and the ITG in any investigation aimed at identifying and stopping the use of TCXC services by illegal robocallers, including the suspension or termination of offending customers where appropriate.

STIR/SHAKEN Implementation Status

TCXC operates as a wholesale marketplace, aggregator, and non-gateway intermediate provider. TCXC does not originate calls from end users and does not terminate calls to end users on its own network. Accordingly, TCXC does not authenticate caller identification information under the STIR/SHAKEN framework and selects **Option 3: No STIR/SHAKEN Implementation** in this filing.

Where calls received by TCXC contain STIR/SHAKEN Identity headers in the SIP payload, TCXC preserves and forwards those headers unaltered to the next-hop provider, in accordance with industry best practices for intermediate providers.