

Filing Entity: Infinite Global Services Ltd (UK Company No. 45883), operating First Digital Holdings LLC (Delaware)

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1. Provider Description

FluxMobile is a mobile-first telecommunications platform providing voice, SMS, and data services via eSIM provisioning across 850+ operator networks. Voice calls originate from verified, KYC-authenticated subscribers through PSTN interconnection with Telnyx, SignalWire, and Sinch as upstream carriers.

2. STIR/SHAKEN Implementation Status

FluxMobile does not currently implement STIR/SHAKEN call authentication directly. Outbound voice traffic is routed through upstream carriers (Telnyx as primary) that provide STIR/SHAKEN attestation on calls transiting their network. FluxMobile plans to implement self-hosted STIR/SHAKEN signing (Level A — Full Attestation) post-launch when call volume and revenue justify the infrastructure investment (estimated Q3–Q4 2026).

3. Robocall Mitigation Practices

FluxMobile employs the following practices to prevent illegal robocalls from originating on its network:

a) Know Your Customer (KYC) Verification All subscribers undergo identity verification through Ballerine + OpenKYC + Watchman KYC/AML before receiving voice service. No anonymous or unverified accounts can originate calls. This supports Level A attestation — the originating provider has verified the subscriber identity and their authorization to use the calling number.

b) Call Volume Monitoring Automated systems monitor per-subscriber call volume and patterns. Abnormal volumes (indicative of robocalling) trigger automatic throttling and account review.

c) Number Authentication Subscribers may only originate calls from numbers assigned to their account through the FluxMobile eSIM provisioning system. Spoofing of caller ID is technically prevented at the platform level — subscribers cannot set arbitrary originating numbers.

d) Complaint Response FluxMobile maintains a traceback cooperation process. Upon receipt of a traceback request from the ITG (Industry Traceback Group) or law enforcement, FluxMobile will:

- Respond within 24 hours
- Identify the originating subscriber
- Suspend the account if illegal robocalling is confirmed
- Cooperate fully with investigation

e) Terms of Service Prohibition FluxMobile's Terms of Service explicitly prohibit:

- Unsolicited bulk calling or messaging
- Caller ID spoofing
- Any form of illegal robocalling Violation results in immediate account termination.

4. Commitment to STIR/SHAKEN

FluxMobile commits to implementing STIR/SHAKEN call signing (self-hosted, Level A attestation) when the following conditions are met:

- Active subscriber base generating sufficient voice revenue
- Infrastructure migrated to static-IP hosting (required for OCSP/certificate signing)
- STI-PA (iconectiv) registration completed (4–8 week approval timeline)

Target: Q3–Q4 2026.

5. Contact for Traceback and Compliance

Robocall Mitigation Contact: Solomon, CEO FIRST DIGITAL HOLDINGS LLC

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