

Robocall Mitigation Program

Filed pursuant to 47 C.F.R. § 64.6305(b) — No STIR/SHAKEN Implementation

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FCC FILER ID (FRN)	0038356101
24-HOUR TRACEBACK CONTACT	compliance@personnect.ai
VOICE SERVICE PROVIDER ROLE	Originating Voice Service Provider
STIR/SHAKEN CERTIFICATION	No STIR/SHAKEN Implementation

1. Statement of Provider Status and Authentication Architecture

Personnect is a non-facilities-based originating voice service provider that obtains DID inventory and outbound trunking from Telnyx LLC, an upstream carrier that maintains its own STI-PA-assigned SPC token and STI-CA-issued certificate.

Personnect does not operate IP-based voice infrastructure that originates SIP traffic onto the public network independent of Telnyx, and does not hold its own SPC token or STI certificate. Pursuant to the Commission's Eighth Report and Order in WC Docket No. 17-97 (FCC 22-72, released October 2022), a downstream provider that lacks direct control over its network infrastructure cannot claim Partial or Complete STIR/SHAKEN Implementation by relying on a third party to sign on its behalf. Personnect therefore certifies that it has no STIR/SHAKEN Implementation and submits this Robocall Mitigation Program in accordance with 47 C.F.R. § 64.6305(b).

All calls originated by Personnect's customers traverse Telnyx's network and are A-level attested by Telnyx where Telnyx has direct attestation authority over the originating

number. Personnect cooperates with Telnyx on all upstream signing decisions and does not interfere with attestation.

2. Customer Onboarding and Know-Your-Customer (KYC) Process

Personnect's current operations are a pre-commercial pilot. Each customer is onboarded by direct relationship to Personnect's officers under a written services agreement signed prior to activation. A Personnect officer manually verifies the customer's identity, the legitimacy of the customer's stated outbound calling use case, and the executed services agreement before outbound calling capability is enabled. No self-service signup is available.

Records of onboarding verification are retained for the duration of the customer relationship plus two years after termination.

3. Acceptable Use Policy

Personnect's Acceptable Use Policy ("AUP") is incorporated into Personnect's public Terms of Service, which every customer must accept (clickwrap) prior to account activation. The current Terms of Service are published at <https://personnect.ai/terms>, with the AUP set forth in Section 5 of that document.

Section 5 prohibits, without limitation: (a) calls in violation of the Telephone Consumer Protection Act (47 U.S.C. § 227); (b) calls to numbers on the National Do-Not-Call Registry without a valid exemption; (c) robocalling, spam calling, or any form of automated dialing to consumers without prior consent; (d) use of the service for harassment, threats, or any illegal purpose; (e) misrepresentation of the caller's identity or the purpose of the call; and (f) violation of any applicable federal, state, or local telecom regulations.

Section 5 expressly provides that violation of the AUP "may result in immediate suspension or termination of your account without refund." This contractual termination right is the basis for the bad-actor termination process described in Section 7 of this Robocall Mitigation Program.

4. Outbound Traffic Monitoring

Personnect's monitoring program is calibrated to its current pilot scale (Section 2):

- **Manual per-customer review.** Given the small cohort and the direct relationship between Personnect's officers and each customer, outbound traffic is reviewed manually by a Personnect officer.
- **Telnyx upstream analytics.** Personnect reviews Telnyx-provided per-customer call analytics (call volume and spam-label or block-rate signals where Telnyx exposes them) on at least a monthly cadence, and on an ad hoc basis whenever a customer is observed to materially change calling pattern.

- **Customer-reported abuse.** Any complaint received via the 24-hour traceback contact (Section 5), via Telnyx, or via any other channel is investigated within one (1) business day.

Investigations that confirm AUP violation result in immediate suspension under Section 7.

5. Twenty-Four-Hour Traceback Response

Personnect's designated traceback contact is:

- **Email:** compliance@personnect.ai
- **Response commitment.** Personnect will acknowledge any traceback request from the Industry Traceback Group, the Federal Communications Commission, the Federal Trade Commission, a state attorney general, or a law-enforcement agency within twenty-four (24) hours of receipt, and will provide responsive call-detail records identifying the originating customer within forty-eight (48) hours of acknowledgment, or sooner if the requesting party indicates urgency.

The traceback contact mailbox is monitored continuously, including weekends and federal holidays, by automatic delivery to a designated officer of Personnect.

6. Industry Traceback Group Cooperation

Personnect cooperates fully with the Industry Traceback Group ("ITG"), the consortium operated by USTelecom and designated by the Federal Communications Commission as the registered traceback consortium under 47 U.S.C. § 227b, and with all traceback requests received from the ITG, the FCC, the FTC, state attorneys general, and law-enforcement agencies. Personnect's response procedure and commitments are described in Section 5 above.

Personnect makes its 24-hour traceback contact (Section 5) available to the ITG and confirms that the contact will be reachable through the contact information published in this Robocall Mitigation Database record and through Personnect's upstream provider, Telnyx LLC.

7. Bad-Actor Termination Process

Personnect's public Terms of Service Section 5 provides that AUP violation "may result in immediate suspension or termination of your account without refund" (<https://personnect.ai/terms>). This contractual right is the basis for the following termination process.

Upon confirmed AUP violation, a traceback finding implicating a Personnect customer in illegal robocalling, or a formal request from the FCC, FTC, ITG, or law-enforcement agency, Personnect takes the following action:

- **Immediate suspension** of the implicated customer's outbound calling capability, no later than twenty-four (24) hours from confirmation.

- **Notice to the customer** stating the basis for suspension and providing a written window (not to exceed seven days) for the customer to provide evidence rebutting the finding.
- **Termination** of the customer relationship if the customer does not rebut the finding, or if the rebuttal is unpersuasive in Personnect's sole discretion. Termination is effected without refund pursuant to Section 5 of the Terms of Service.
- **Retention of records** of the violation, suspension, and termination for two (2) years.

8. Annual Review and Updates

Personnect will review this Robocall Mitigation Program at least annually, and will update its filing in the Robocall Mitigation Database whenever:

- Telnyx changes its STIR/SHAKEN attestation policy in a manner that affects how Personnect's traffic is signed.
- Personnect obtains its own SPC token and STI certificate.
- The FCC issues new rules under WC Docket No. 17-97 or related proceedings affecting non-facilities-based providers.
- Material changes occur to the KYC process, AUP, monitoring practices, traceback contact, or termination process described above.

The undersigned officer of Personnect.ai LLC hereby certifies, under penalty of false statement, that this Robocall Mitigation Program accurately describes the practices currently in effect or scheduled for implementation as expressly stated herein, and that Personnect.ai LLC commits to executing the program as described.

SIGNATURE OF AUTHORIZED OFFICER

DATE

PRINTED NAME

TITLE