

Robocall Mitigation Program Description

FCC Robocall Mitigation Database Filing

1. Company Information

Legal Entity Name: Nublicity Inc

Business Address: 11501 SW 144th Avenue, Miami, FL 33186

Traceback Point of Contact: Dean Reynolds

Contact Email: DeanR@nublicity.com

Contact Phone: 305-398-0802

Filing Date: May 29, 2026

2. Exemption Basis

Nublicity Inc is exempt from STIR/SHAKEN implementation obligations pursuant to **47 CFR § 64.6304(b)** as a small voice service provider with fewer than 100,000 subscriber lines across all affiliates. Nublicity Inc operates as a Managed Service Provider (MSP) that resells VoIP services to business clients in South Florida. Voice services are provisioned through an upstream wholesale provider (SkySwitch) that maintains STIR/SHAKEN compliance at the call origination level. Nublicity Inc does not own or operate its own network infrastructure for call origination and does not directly assign telephone numbers to end users.

3. Robocall Mitigation Practices

Notwithstanding the exemption from STIR/SHAKEN implementation, Nublicity Inc maintains a robust robocall mitigation program consistent with **47 CFR § 64.6305(a)**. This program includes the following reasonable steps to avoid originating illegal robocall traffic:

1. Customer Verification: Nublicity Inc verifies the identity and legitimate business purpose of all customers prior to provisioning voice services. New customers are subject to a review process that includes business verification and agreement to acceptable use policies prohibiting illegal robocalling.

2. Upstream Provider Reliance: Nublicity Inc routes all voice traffic through SkySwitch, a wholesale VoIP provider that implements STIR/SHAKEN call authentication at the origination level, providing an additional layer of robocall prevention.

3. Acceptable Use Policy Enforcement: All customers are required to execute an Acceptable Use Policy (AUP) that explicitly prohibits the use of Nublicity Inc's services for illegal robocalling, spoofing, or any calling activity that violates the Telephone Consumer Protection Act (TCPA) or FCC regulations.

4. Traffic Monitoring: Nublicity Inc monitors customer call traffic patterns for anomalies indicative of illegal robocall activity, including unusual call volumes, high call failure rates, or abnormal calling patterns.

5. Customer Suspension: Nublicity Inc reserves the right to immediately suspend or terminate service to any customer found to be engaging in illegal robocall activity.

6. Staff Awareness: Nublicity Inc ensures that relevant personnel are aware of FCC robocall regulations and the company's obligations under its mitigation program.

4. Traceback Response Commitment

Nublicity Inc commits to respond fully and within **24 hours** to all traceback requests from the Federal Communications Commission, law enforcement agencies, and the industry traceback consortium (USTelecom Industry Traceback Group). Nublicity Inc further commits to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

All traceback requests should be directed to the point of contact identified in Section 1 of this document. Nublicity Inc will maintain records sufficient to respond to traceback requests and will retain such records for a minimum of two years.

5. Certification

Nublicity Inc certifies that: (a) it has not implemented STIR/SHAKEN authentication on any portion of its network; (b) any prior certification filed with the FCC has not been removed by Commission action; (c) it has not been prohibited from filing in the Robocall Mitigation Database by the Commission; and (d) the information contained in this filing is true, accurate, and complete.

Authorized Signature: Dean Reynolds, Nublicity Inc

Date: May 29, 2026