

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Filer Name: BulkBuys **Filer FRN:** 0038599809 **Associated Platform/Infrastructure:** pbx.bulkbuysn.net **Date:** June 28, 2026

1. PURPOSE & STIR/SHAKEN EXEMPTION CONTEXT BulkBuys operates as a downstream Voice Service Provider (VoIP Reseller) via the hosted infrastructure pbx.bulkbuysn.net. BulkBuys lacks the direct underlying IP carrier infrastructure required to interface with the STIR/SHAKEN Policy Administrator or natively issue cryptographic tokens. Pursuant to 47 CFR § 64.6304, 100% of outbound traffic originated on our platform is routed to upstream wholesale carrier networks. These upstream partners handle token authentication and digitally sign the caller ID information using the STIR/SHAKEN framework on our behalf. BulkBuys maintains this Robocall Mitigation Program to ensure the absolute legitimacy of all traffic before handing it off to upstream networks.

2. KNOW YOUR CUSTOMER (KYC) & ONBOARDING VETTING To prevent new and renewing customers from originating illegal robocalls, BulkBuys enforces strict Know-Your-Customer onboarding guidelines:

- All business customers must provide a verifiable physical business address, corporate formation documentation, a valid Employer Identification Number (EIN), and a designated point of contact with verified email and phone details.
- BulkBuys reviews the intended use-case of the PBX platform prior to service activation.
- High-risk or high-volume outbound dialer traffic is strictly prohibited. Service agreements explicitly forbid the transmission of illegal robocalls, telemarketing violations, or unauthorized spoofing, with violations resulting in immediate account termination.

3. CALLER ID INFRASTRUCTURE & SPOOFING CONTROLS

- BulkBuys restricts outbound Caller ID generation on pbx.bulkbuysn.net. Customers may only utilize Direct Inward Dialing (DID) numbers that are assigned directly to their account or numbers where they have proven explicit authorization and right of use.
- Arbitrary or random outbound spoofing is programmatically blocked at the PBX tier.

4. TRAFFIC MONITORING AND ANOMALY DETECTION BulkBuys monitors call detail records (CDRs) to actively prevent rogue behavior:

- Automated rate limits (calls-per-second and simultaneous channels) are established per client to prevent automated storm-dialing.
- Regular audits are performed to look for anomalous calling profiles, such as extreme spikes in short-duration calls or abnormally low Call Completion Rates (ASR), which indicate unauthorized robocalling activity.

5. 24-HOUR TRACEBACK COMPLIANCE COMMITMENT BulkBuys fully commits to cooperating with the Federal Communications Commission (FCC), federal/state law enforcement, and the Industry Traceback Group (ITG).

- BulkBuys maintains a designated response team capable of identifying the specific source customer of any call segment within 24 hours of receiving an official traceback request.
- If a customer is identified as the source of unauthorized or fraudulent robocalls via a traceback notification, BulkBuys will immediately suspend the customer's outbound trunks pending investigation and permanently terminate repeat offenders.