



EMPOWERING CONVERSATIONS, GLOBALLY.

## Robocall Mitigation Program

FCC Robocall Mitigation Database

### 1. Company Information

**Legal Name** TalkTelX Corp

**State of Incorporation** Florida

**Principal Business Address** 7901 4th St N, #34260, St. Petersburg, FL 33702

**FCC Registration Number (FRN)** 0038536264

**Operating Company Number (OCN)** 425M

**FCC Form 499 Filer ID** 839018

**FCC Form 499-Q Filing ID** 2844700

**Federal Tax ID (EIN)** 30-1494119

**Service Type** Wholesale Voice Service Provider

TalkTelX Corp (referred to here as “TalkTelX” or “the Company”) is a Florida wholesale VoIP carrier. The Company originates voice traffic for wholesale and end-user customers and carries voice traffic between originating and terminating providers. This Program may be updated at any time to reflect changes in the Company’s business, network, or applicable law.

### 2. Principals, Affiliates, Subsidiaries, and Parent Companies

TalkTelX Corp is a privately held Florida corporation. Its principal and Chief Executive Officer is **Mazhar Hussain**. TalkTelX has no parent company and no subsidiaries.

TalkTelX has no affiliated entities under common ownership or control.

### 3. Purpose and Regulatory Authority

This Robocall Mitigation Program outlines how TalkTelX prevents illegal robocalls, in accordance with FCC rules and the TRACED Act. The goal is straightforward: keep illegal, unwanted, and fraudulent robocalls off the Company’s network, and act quickly to shut down anything that does get through. TalkTelX enforces this Program at all times, alongside the full STIR/SHAKEN authentication described below.

### 4. STIR/SHAKEN Implementation Status

TalkTelX has implemented STIR/SHAKEN and signs the calls it originates. It holds an active FCC Form 499 Filer ID (**839018**) and has been assigned Operating Company Number **425M** by NECA. It has registered with the STI Policy Administrator (iconectiv), obtained its own Service Provider Code (SPC) token, and obtained its own digital certificate from an approved STI Certification Authority. TalkTelX authenticates the calls it originates using its own certificate, tied to its own SPC token, and does not rely on another provider’s certificate.

For traffic it carries that is already signed by another provider, TalkTelX preserves the SIP Identity header so the original attestation reaches the terminating provider unchanged.

Attestation follows TalkTelX's actual knowledge of each call:

- **Attestation A** when the number is assigned by TalkTelX or the customer's right to use it has been verified.
- **Attestation B** when the customer is verified but authority over the specific number has not been confirmed.
- **Attestation C** when TalkTelX originates a call it cannot verify to the level required for A or B.

Caller IDs that TalkTelX did not assign must be verified as authorized for the customer before any traffic is originated. Numbers that cannot be verified are blocked.

## 5. Role in the Call Chain

For traffic it originates, TalkTelX acts as a wholesale Voice Service Provider. In that role, it runs Know Your Customer checks, confirms who the customer is and what kind of traffic they intend to send, prohibits illegal robocalling and unlawful spoofing by contract, and watches the traffic those customers send.

For traffic that transits its network, TalkTelX acts as a Non-Gateway Intermediate Provider. It preserves the SIP Identity header so any attestation already on the call reaches the terminating provider unchanged, watches transit traffic for unusual patterns, and works with the providers on both sides of the call. As it holds its own STIR/SHAKEN certificate, TalkTelX authenticates calls where it is the first intermediate provider to receive unauthenticated SIP traffic, as the rules require.

## 6. Know Your Upstream Provider

TalkTelX exchanges traffic with upstream and interconnecting carriers only under written Master Service Agreements. Before it sends or accepts traffic with any such provider, TalkTelX confirms that the provider is listed in the Robocall Mitigation Database, holds an active FCC Form 499 registration where one is required, and has either implemented STIR/SHAKEN or filed its own robocall mitigation program. Each upstream provider agrees by contract to sign or pass traffic in line with the FCC's STIR/SHAKEN and robocall mitigation rules and to cooperate with tracebacks.

TalkTelX re-checks each provider's RMD listing on a regular basis. It stops exchanging traffic with any provider that is removed from the Database, that loses its required registrations, or that fails to cooperate with a traceback, and it cooperates with upstream and downstream providers to investigate and shut down illegal traffic.

## 7. Know Your Customer and Onboarding

No customer is turned up until it clears the Company's KYC review. Every customer signs a Master Service Agreement that includes TCPA and Do-Not-Call obligations, signs the Acceptable Use Policy, and completes a KYC questionnaire. The Company also collects a business formation document, proof of good standing, proof of a physical business address, government-issued ID for an authorized signatory, and an EIN where one applies.

Wholesale customers provide more. On top of the items above, they supply their FCC Form 499 Filer ID, their Robocall Mitigation Database listing, and their USAC registration. TalkTelX confirms each wholesale customer by reaching the official email and phone number shown on that company's 499 and RMD filings before service is activated.

End-user customers provide the same business documentation. If an end user happens to hold a 499 Filer ID or an RMD listing, the Company collects and verifies those as well.

TalkTelX reviews everything submitted, asks for more if something is missing, and resolves any mismatch before service starts. Any customer that plans to send autodialed traffic has to provide more detail up front: who the calls are made on behalf of, a sample script or recording, the ANIs that will be used, proof of a Do-Not-Call subscription, evidence of recipient consent where it is required, and the campaign's calls-per-second and run

dates.

## 8. Acceptable Use Policy

TalkTelX enforces a strict Acceptable Use Policy. By contract, customers agree not to use the service for anything illegal, fraudulent, deceptive, or abusive. They agree not to use it for telemarketing that breaks the Telephone Consumer Protection Act (47 U.S.C. § 227) and FCC rules (47 C.F.R. § 64.1200), the FTC Telemarketing Sales Rule, the CAN-SPAM Act, or any federal or state Do-Not-Call law. They also agree not to transmit false or spoofed caller ID in violation of the Truth in Caller ID Act. A violation gives TalkTelX the right to suspend or terminate the service immediately.

## 9. Traffic Filtering and Monitoring

- Every customer trunk runs through several fraud and compliance checks before and during call setup: calling lists are scrubbed against the Federal Do-Not-Call Registry before dialing, and the Company recommends scrubbing against the FCC Reassigned Numbers Database ([reassigned.us](https://reassigned.us)).
- Do-Not-Originate (DNO) numbers are filtered out.
- ANIs are validated against the ranges assigned to or verified for that customer.
- DNIS destinations are validated, and wireless numbers are not allowed as caller ID unless the customer is authorized to use them.
- Invalid, unallocated, and non-dialable numbers are blocked.
- Patterns that look like neighborhood spoofing are flagged for review.
- Third-party reputation and complaint data are used as additional signals.

On top of those checks, TalkTelX watches its own switch in real time for abnormal volume, velocity, and calling patterns, and blocks suspected illegal traffic while it investigates.

## 10. Traceback Response and Enforcement

TalkTelX answers every traceback request from the FCC, law enforcement, and the Industry Traceback Group (ITG) as fast as it can. In practice, that is usually within one to two hours of receipt, and never more than twenty-four (24) hours. The Company cooperates fully and hands over all lawfully available information needed to identify the source of the traffic.

A traceback notice starts an internal investigation. On its own, it does not mean a customer broke the law. When the problem is isolated or accidental, such as a reassigned or honeypot number that was reached despite documented scrubbing, the Company makes the customer fix it right away by removing the number and re-scrubbing its lists against the Do-Not-Call Registry and the FCC Reassigned Numbers Database. When a customer is found to be using the service for illegal robocalling, fails to correct the problem, or where the activity is willful, fraudulent, high in volume, or the customer ignores a traceback, TalkTelX suspends or terminates the account. The Company has zero tolerance for illegal robocalling.

Depending on the situation, TalkTelX may require offending numbers to be removed and lists re-scrubbed, cut the customer's capacity, block specific numbers or prefixes, suspend the account pending review, terminate the account outright, or notify upstream and downstream providers and regulators. The Company can act immediately when the severity or volume of the traffic calls for it, and it documents every investigation, finding, and action it takes.

## 11. Prior Regulatory Actions

Neither TalkTelX Corp nor any affiliated entity has been the subject of any formal FCC, law enforcement, or regulatory action or investigation in the past two years arising from suspected illegal robocalling or unlawful spoofing, or from any deficiency in a Robocall Mitigation Database certification.

## 12. Record Retention

TalkTelX keeps its KYC and onboarding files, Master Service Agreements and AUP acknowledgments, Call Detail Records, traceback notices and responses, complaint records and outcomes, and suspension and termination notices for at least two (2) years, and longer where the law requires it.

## 13. Review and Revision

TalkTelX reviews this Program on an ongoing basis and revises it as needed to keep up with changes in its operations and with FCC rules.

## 14. Authorized Contacts

**Compliance & Traceback** compliance@talktelx.com

**Primary Contact** Mazhar Hussain mazhar@talktelx.com +1 727 435 3853

**Mailing Address** 7901 4th St N, #34260, St. Petersburg, FL 33702

**FRN** 0038536264

## 15. Certification

I, Mazhar Hussain, as the Chief Executive Officer of TalkTelX Corp, certify under penalty of perjury that the information in this Robocall Mitigation Program is true and accurate to the best of my knowledge and belief, and that TalkTelX Corp has put in place the procedures described in it.

Signature:

Name: Mazhar Hussain

Title: Chief Executive Officer, TalkTelX Corp

Date: 07/12/2026

FRN: 0038536264