

Robocall Mitigation Plan

Pursuant to 47 CFR § 64.6305(a)

1. STIR/SHAKEN IMPLEMENTATION

The Company does not own, lease, or operate physical telecommunications switches, PSTN gateways, or infrastructure capable of interacting with the Secure Telephone Identity Policy Administrator (STI-PA).

Pursuant to 47 CFR § 64.6305(a), the Company implements this Robocall Mitigation Plan (RMP) to take all reasonable steps to avoid originating illegal robocall traffic. The Company relies entirely on its upstream facilities-based carrier, Skyetel, to perform STIR/SHAKEN cryptographic call signing at the network layer.

2. "KNOW YOUR CUSTOMER" (KYC) ONBOARDING PROCEDURES

Identity Verification: The Company collects and verifies the legal business name, physical address, Employer Identification Number (EIN), and contact information of the business owners.

Service Intent: Customers must state the intended use of the voice service. The Company does not onboard high-volume telemarketers, automated dialers, or traffic aggregators.

Agreement Clauses: Service agreements explicitly prohibit the use of the hosted 3CX system for spoofing, deceptive caller ID practices, or illegal telemarketing.

3. TRAFFIC MONITORING AND MITIGATION

The Company proactively monitors its hosted 3CX infrastructure to detect anomalous calling patterns that deviate from normal business activities:

Anomaly Detection: The Company tracks call volumes and short-duration calls. A sudden, unexplained spike in outbound calls triggers an immediate internal investigation.

Immediate Suspension: If a client is suspected of generating illegal robocalls, malicious spoofing, or automated spam, the Company reserves the right to immediately suspend SIP trunk credentials and terminate the client's access to the network.

4. 24-HOUR TRACEBACK COOPERATION

The Company is fully committed to cooperating with law enforcement and industry enforcement bodies to eliminate illegal robocalls:

24-Hour Response: The Company commits to responding fully and within 24 hours to all traceback requests from the Federal Communications Commission (FCC), law enforcement entities, and the Industry Traceback Group (ITG).

Point of Contact: The Company maintains monitored email and phone contact information for traceback requests.

Upstream Cooperation: The Company will work directly with its upstream carrier, Skyetel, to swiftly trace and isolate any malicious or fraudulent traffic originating from its downstream infrastructure.

5. TRACEBACK CONTACT INFORMATION

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This document is intended to describe the Company's robocall mitigation procedures and traceback cooperation practices.