

SUPERIOR CALL / SUPERIOR PBX ROBOCALL MITIGATION PROGRAM DESCRIPTION

Effective August 25, 2026

1. Provider and service

Superior Call / Superior PBX (the "Filer") is a Canadian foreign voice service provider offering hosted, multi-tenant voice service to business end users. Bell Canada is the current upstream voice carrier. Bulk Solutions, LLC (BulkVS) may be used for U.S. numbers and traffic only after its separate SIP activation and compliance review is completed.

The Filer selected Option 3 - No STIR/SHAKEN Implementation. It does not possess an SPC token or STIR/SHAKEN certificate and does not sign calls using a certificate issued to the Filer. Carrier authentication performed under an upstream carrier's certificate is not represented as the Filer's implementation. The basis for Option 3 is the FCC's treatment of foreign voice service providers under 47 CFR Sections 64.6300(c) and 64.6305(g)(2), as explained in DA 26-72, Appendix A, Questions 2 and 3.

2. Customer and upstream-provider vetting

Before production calling is enabled, the Filer reviews the customer's business identity, contact information, service address, intended calling use, and requested telephone numbers. Accounts are tied to a specific organization and subscription. Calling access requires authenticated users or active, scoped API credentials. Anonymous, materially inconsistent, deceptive, or prohibited uses are rejected or suspended. Customer information is reviewed again when material account information or calling behavior changes.

The Filer knows its direct upstream providers and maintains their account and interconnection information. Before exchanging U.S. traffic with an upstream provider, the Filer verifies the provider's identity and, where applicable, its Robocall Mitigation Database status. Bell Canada is the current upstream provider. BulkVS will not carry production traffic until provider onboarding and technical activation are complete.

3. Measures to prevent illegal calls

The Filer takes the following reasonable steps:

- Outbound calls require an authenticated user or an active API key with call-write permission.
- Tenant and project boundaries prevent one customer from using another customer's numbers or calling resources.
- The asserted caller ID must be an enabled number assigned to and authorized for the calling organization and user. Unauthorized caller IDs are rejected.
- Outbound destinations are normalized and limited by the platform's approved Canada and United States calling policy.
- Production request rate limits, subscription and minute limits, and account, project, user, and credential status controls limit unauthorized or abnormal use.
- Automated outbound AI calls require recorded consent information, including the consent basis, source, and capture time, before origination.
- Call-detail records and operational events associate calls with the responsible organization, project, user or API credential, calling number, destination, time, and upstream carrier.
- The Filer may disable users, revoke API keys, suspend accounts or projects, block calling, and preserve relevant records when it identifies suspected illegal activity.

The Filer does not currently operate a separate third-party robocall analytics platform. It uses its own account, authorization, usage, and call-record controls and relies on Bell Canada, and BulkVS when activated, for carrier-level analytics, call authentication, and blocking performed within their networks.

4. Monitoring, complaints, and remediation

The Filer reviews customer complaints, carrier notices, unusual calling volume, repeated authorization failures, caller-ID inconsistencies, and traceback requests. Suspected illegal calling is investigated promptly. Depending on risk and available evidence, the Filer may restrict or suspend calling, revoke credentials, contact the customer, notify an upstream provider, preserve records, and terminate service. Service is not restored until the Filer determines that the risk has been adequately addressed.

5. Traceback and cooperation

The Filer commits to respond fully within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, and the Industry Traceback Group. The Filer will cooperate in investigating and stopping illegal callers using its service and will use available account, authorization, call-detail, and carrier-routing records to identify the responsible customer and upstream provider.

6. Program administration

The officer and robocall-mitigation contact identified in the Filer's RMD submission are responsible for this program. The Filer reviews this program when its services, upstream providers, calling controls, or legal obligations change and updates its RMD filing within the period required by FCC rules.

This program does not claim confidentiality. It is intended to accompany the Filer's public RMD submission.