

Health Numeric — Robocall Mitigation Program Description

****FCC Robocall Mitigation Database (RMD) filing****

****Filer:** Health Numeric**

****FRN:** 0030253827**

****Filing type:** Voice Service Provider Filing**

****Role in call chain:** Voice Service Provider without a STIR/SHAKEN obligation**

****STIR/SHAKEN certification:** Has not implemented STIR/SHAKEN on any portion of a network it controls**

****OCN:** None**

****Date:** September 8, 2026 (ET)**

1. Purpose and scope

Health Numeric maintains this robocall mitigation program to take reasonable steps to avoid originating, carrying, or processing illegal robocall traffic in connection with voice services it provides to end users, consistent with 47 CFR § 64.6305.

Health Numeric is a U.S. healthcare services company that provides voice connectivity for its Health Operation Center (HOC) and related clinical/operational communications through a hosted UCaaS/PBX platform provided by SkySwitch. Health Numeric does ****not**** operate a facilities-based PSTN network, does ****not**** hold an Operating Company Number (OCN), does ****not**** hold a Service Provider Code (SPC) token, and does ****not**** control the SIP edge or STI certificate infrastructure required to implement STIR/SHAKEN authentication itself.

2. Basis for no STIR/SHAKEN implementation obligation

Under 47 CFR § 64.6301 and § 64.6305(d), Health Numeric has no STIR/SHAKEN implementation obligation because it ****lacks control over the network infrastructure necessary to implement STIR/SHAKEN****. Relatedly, it is not capable of obtaining and using its own SPC token for caller-ID authentication in the manner required for a facilities-based authenticator (§ 64.6304(b) context).

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Any STIR/SHAKEN authentication applied to traffic associated with numbers used on Health Numeric's hosted voice service is performed by the underlying facilities-based provider(s) (SkySwitch and/or its upstream carriers), not by Health Numeric. Health Numeric therefore certifies that it has ****not**** implemented STIR/SHAKEN on any portion of a network it controls, and relies on this mitigation program plus upstream provider diligence.

(Small-provider deadline extensions under § 64.6304(a) are not claimed; those deadlines have expired.)

3. Role in the call chain

Health Numeric acts as a ****voice service provider serving end users**** (HOC agents, authorized staff, and clinic/operational users of its hosted voice service). It does ****not**** act as:

- a wholesale provider originating calls on behalf of other voice service providers;
- a gateway provider; or
- a non-gateway intermediate provider for third-party carrier traffic.

Outbound calling is limited to legitimate healthcare operations (patient outreach related to remote patient monitoring / care management workflows, clinic coordination, and internal operations). Health Numeric does not market or sell high-volume dialer / robocall origination services to the public.

4. Know Your Customer (KYC) — measures to prevent illegal origination

Health Numeric takes the following effective measures so that users of its voice service do not originate illegal robocalls:

1. ****Limited user population.**** Voice seats/users are provisioned only for known Health Numeric personnel and expressly authorized operational users (e.g., HOC agents). Access is not offered as an open retail VoIP product to anonymous customers.
2. ****Identity and authorization before service.**** Before granting voice access, Health Numeric confirms the user's identity and employment/authorization relationship (name,

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role, and business need). Shared or undocumented accounts are not permitted as a practice.

3. ****Contractual / policy prohibitions.**** Users are prohibited from using Health Numeric voice services to place illegal robocalls, spoof caller ID in a misleading or unlawful manner, or originate traffic that violates TCPA, TSR, or FCC robocall rules. Violations are grounds for immediate suspension of voice access.

4. ****Number assignment control.**** DIDs and outbound calling identity are assigned and managed through Health Numeric's SkySwitch domain administration. Users may not self-provision arbitrary caller-ID presentation outside approved numbers/routes.

5. ****Ongoing access review.**** Seat/user access is reviewed when roles change or employment/authorization ends; unused or departed-user access is disabled.

6. ****No high-risk customer classes.**** Health Numeric does not onboard telemarketing dialer platforms, lead-generation spam callers, or other high-risk robocall-originator business models onto its voice service.

5. Know Your Upstream Provider (KYUP)

Health Numeric's voice path rides the SkySwitch hosted platform and its upstream interconnection partners.

1. Health Numeric confirms SkySwitch (and, as applicable, its disclosed upstream carriers) maintain current Robocall Mitigation Database filings and robocall mitigation practices appropriate to their roles.

2. Health Numeric monitors for material notices from SkySwitch regarding authentication, blocking, traceback, or compliance changes that affect Health Numeric domains or numbers.

3. Health Numeric will not knowingly accept voice service arrangements from upstream providers that have been removed from the RMD or that Health Numeric has reason to believe are facilitating illegal robocall traffic.

4. If SkySwitch or an upstream provider is subject to FCC enforcement or RMD removal affecting Health Numeric traffic, Health Numeric will promptly assess continuity options and update this program / its RMD filing within required timelines.

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6. Call analytics and traffic monitoring

1. Health Numeric relies on platform-native and carrier-side analytics, fraud/robocall controls, and traceback tooling made available by SkySwitch and its upstream providers for traffic on Health Numeric's hosted domains.
2. Health Numeric monitors operational voice use for anomalous patterns inconsistent with HOC/clinical operations (e.g., sudden high-volume outbound campaigns, unusual after-hours blast patterns, or complaints of illegal robocalls).
3. Upon detection or credible complaint of suspected illegal robocall traffic, Health Numeric will investigate promptly, suspend implicated user access if warranted, remediate routing/number assignment as needed, and escalate to SkySwitch and, where appropriate, to the Industry Traceback Consortium / law enforcement / FCC.

Health Numeric does not currently operate a separate branded third-party robocall analytics product beyond the controls available through its upstream platform; any future analytics vendor will be added to an updated RMD filing within 10 business days of material change.

7. Traceback and law-enforcement cooperation (24-hour commitment)

Health Numeric commits to:

1. Respond to all traceback requests from the FCC, law enforcement, and the industry traceback consortium ****within 24 hours**** of receipt;
2. Cooperate fully in investigating and stopping any illegal robocallers that use its service to originate calls; and
3. Preserve and produce relevant call detail, user identity, and provisioning records reasonably available to Health Numeric in support of such investigations.

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Robocall mitigation contact (primary):

Nevin Brittain, CEO

Health Numeric

Email: nevin@healthnumeric.com

Phone: 833-832-4767

(Alternate operational contact may be designated in writing and reflected in an updated RMD filing.)

8. Enforcement history

As of the date of this filing, Health Numeric has ****not**** been the subject of a Commission, law enforcement, or other governmental action or investigation in the prior two years related to suspected illegal robocalling or spoofing, and has not had an RMD certification removed for deficiency (to Health Numeric's knowledge).

9. Program governance and updates

1. This program is owned by Health Numeric executive leadership (CEO) with day-to-day voice administration under Health Numeric's operations / engineering designees for the SkySwitch HealthNum domain.

2. Health Numeric will update its RMD certification and this mitigation plan within ****10 business days**** of any material change (role in the call chain, STIR/SHAKEN status, upstream provider, KYC process, contact information, or enforcement history).

3. Health Numeric will review this program at least annually, or sooner after any traceback event or material vendor change.

10. Certification statement (program level)

Health Numeric certifies that all calls it originates in connection with its voice service are subject to this robocall mitigation program; that it has not been prohibited from filing in the Robocall Mitigation Database; and that the information in this description is true and accurate to the best of its knowledge as of the filing date.

End of Robocall Mitigation Program Description