

Robocall Mitigation Program

Gemini Computing LLC

Prepared September 10, 2026 | Review version

Proposed program - not yet ready for certification. The service model, existing-client restriction, contact information, and 24-hour response commitment below were provided by the owner. Operational procedures described as commitments require owner review, adoption, and implementation before this document is filed. This review version does not certify that those procedures are already in place.

1. Scope and responsibility

This program covers all voice traffic provided by Gemini Computing LLC to its customers. Gemini resells voice service through Voxtelesys, with customer 3CX phone systems connected directly to Voxtelesys SIP trunks. Gemini serves only customers with whom it has an existing managed-service relationship.

Responsible person: Craig Paull, Owner

Email: craig@gemini-computing.com

Telephone: 979-985-2095

Craig Paull is responsible for customer review, abuse investigation, provider coordination, and the accuracy of the Robocall Mitigation Database filing. He has confirmed that he can respond fully to traceback requests within 24 hours, including weekends.

2. Customer verification and permitted use

Gemini restricts voice service to its existing managed-service clients. Under this program, before activating voice service, Gemini will document each client's legal business name, business address, authorized contact, contact details, expected calling use, and assigned telephone numbers or evidence of authority to use those numbers. Gemini will use its existing service records and direct relationship to verify these details and resolve discrepancies before activation.

At renewal and when ownership, contacts, calling use, or traffic patterns change, Gemini will recheck this information. An existing relationship does not excuse suspicious conduct. Unexplained inconsistencies, impersonation, or refusal to provide information will result in deferred activation or investigation and restriction of existing service.

Gemini will communicate and enforce a prohibition on illegal robocalls, unlawful caller-ID spoofing, and unauthorized use. Customers must comply with applicable consent and calling restrictions and the Voxtelesys acceptable-use requirements. Gemini will not enable a new automated or bulk-calling use without reviewing its purpose and compliance and confirming that the upstream provider permits it.

Detection and response

3. Call monitoring and analytics

Gemini has not identified a separate robocall analytics vendor or a currently configured automated monitoring system of its own. It does not claim that 3CX alone provides a complete robocall detection service. Voxtelesys is the underlying voice provider, not a separately confirmed analytics contractor for Gemini.

Voxtelesys's published Acceptable Use Policy describes traffic-quality analytics and states that it may monitor and investigate traffic and restrict suspected illegal or abusive calls. Gemini has not verified specific account-level thresholds, notifications, or analytics tools. It will confirm available controls and alert delivery with Voxtelesys and record the response.

Under this program, Craig Paull will review available 3CX or Voxtelesys call-detail and usage records at least weekly and promptly upon a complaint or provider alert. Reviews will look for unexplained increases in volume, unusual destinations or calling hours, repeated short or unanswered calls, and caller-ID or use patterns inconsistent with the client's business. Where needed records are unavailable, Gemini will request them from Voxtelesys and document the limitation and follow-up.

The responsible contact will monitor the listed email and telephone daily, including weekends, for abuse reports and traceback requests. Findings, customer explanations, provider communications, and corrective actions will be recorded in an incident log.

4. Investigation, blocking, and remediation

For suspected abuse, Gemini will identify the affected client, numbers, and relevant call times; preserve available records; contact the client through a verified contact; and promptly escalate to Voxtelesys support. Credible indications of ongoing illegal calls will trigger prompt restriction of the affected service using controls available to Gemini or an urgent request for Voxtelesys to block or suspend the traffic.

Gemini will cooperate with Voxtelesys, the FCC, law enforcement, and the industry traceback consortium in investigating and stopping illegal calling. Reinstatement will require documented correction of the cause and review of the client's explanation. Repeated or unresolved abuse will result in termination of affected voice service. Suspected credential compromise will also trigger credential changes and review of system access.

5. Traceback response

Gemini commits to respond fully within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. Craig Paull will verify the request, identify the customer and call path, preserve relevant records, and provide available requested information securely within that period. He will promptly obtain any missing carrier records from Voxtelesys, explain any unavailable information, and continue cooperating until the inquiry is resolved. An acknowledgment alone is not treated as a full response.

Provider oversight and maintenance

6. Know-your-provider procedures

Voxtelesys is the identified underlying carrier connection. Under this program, Gemini will retain its service agreement and verified provider support contacts, confirm the provider's legal identity and active Robocall Mitigation Database listing before filing this program, and review that listing at least quarterly and upon a relevant notice. Any additional provider will undergo the same review before use. Gemini will investigate adverse regulatory or abuse information and stop using a provider where required by applicable rules or Commission orders.

Gemini will not treat a provider's presence in the database as proof that all of its traffic is lawful. Provider notices, traceback activity, and unresolved abuse will be considered in ongoing provider review. If Gemini accepts traffic directly from another provider in the future, it will first reassess the applicable provider-screening requirements and update this program.

7. STIR/SHAKEN status and basis

Gemini's described configuration uses customer 3CX systems connected directly to Voxtelesys SIP trunks. The exemption described here depends on Gemini lacking control of the network infrastructure necessary to implement STIR/SHAKEN; using Voxtelesys by itself does not establish an exemption. The owner must confirm this network-control statement before filing.

On that basis, the implementation requirement under 47 CFR 64.6301 does not apply to Gemini, consistent with the First Caller ID Authentication Report and Order, 35 FCC Rcd 3241, 3260, paragraph 40 (2020), and FCC 24-120, paragraphs 17-19. Gemini does not claim complete or partial implementation based solely on its supplier signing calls. This does not remove Gemini's applicable robocall mitigation or certification obligations.

8. Records and program review

Gemini will retain customer-verification records, provider checks, incident logs, traceback correspondence, and corrective-action records securely for at least two years as an internal program policy, and longer when subject to a preservation request or other applicable requirement. Call-detail availability will be documented with Voxtelesys; this policy does not assert an unverified carrier retention period.

Craig Paull will review the program at least annually and after a material service change or abuse incident. Gemini will update its database filing within applicable FCC deadlines and complete required recertifications. Any change in network control, signing arrangements, providers, or monitoring tools will prompt reassessment of the filing and program.

References

47 CFR 64.6305 (robocall mitigation and certification) and 64.1200(n) (provider obligations).

FCC 24-120, paragraphs 17-19: <https://docs.fcc.gov/public/attachments/FCC-24-120A1.pdf>

Voxtelesys Acceptable Use Policy, reviewed September 10, 2026: <https://voxtel.com/document/acceptable-use-policy>