

PJL Telecom LLC

Robocall Mitigation Program Description

FCC Registration Number (FRN): 0031579329

Version 6 | October 5, 2026

1. Purpose

This document describes the robocall mitigation program of PJL Telecom LLC ("PJL") as required by 47 CFR § 64.6305 and the Commission's Robocall Mitigation Database filing instructions. It describes PJL's role in the call chain, its STIR/SHAKEN certification and the basis for it, the reasonable steps PJL takes to avoid originating illegal robocall traffic, its commitment to respond to traceback requests, and its disclosure of prior Commission action.

2. Company Overview and Role in the Call Chain

PJL Telecom LLC is a Colorado limited liability company that has provided business telephone services since 2018. PJL provides hosted PBX (cloud phone system) service to business customers, including motels, hotels and small businesses. All customers are United States businesses with physical locations.

PJL files as a **voice service provider serving end users**. PJL operates the hosted PBX systems that serve its customers on servers it controls. PJL resells SIP trunking from its upstream carrier, Fourteen IP Inc. d/b/a ClearlyIP ("ClearlyIP"), under ClearlyIP's reseller program. All outbound calls from PJL customers are routed to ClearlyIP, which interconnects with the public switched telephone network (PSTN) and authenticates those calls. PJL does not operate any PSTN interconnection, does not act as a wholesale or intermediate provider for other carriers, and does not carry traffic on behalf of other voice service providers.

3. Certification and STIR/SHAKEN Status

PJL certifies under **Option 3 (No STIR/SHAKEN Implementation)**. All calls that PJL originates are subject to the robocall mitigation program described in this document, consistent with 47 CFR § 64.6305(a). This program includes reasonable steps to avoid originating illegal robocall traffic and a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement and the industry traceback consortium, and to cooperate with those entities in investigating and stopping any illegal robocallers that use PJL's service to originate calls. PJL has not implemented the STIR/SHAKEN authentication framework on any portion of its network. PJL's prior certification history is disclosed in Section 10.

Basis for exemption. PJL does not control the network infrastructure necessary to implement STIR/SHAKEN authentication. PJL provides hosted PBX service and routes all outbound calls to ClearlyIP, which interconnects with the PSTN and authenticates PJL's customers' outbound calls. PJL operates no PSTN interconnection or call signing infrastructure of its own. Under the Commission's Second Caller ID Authentication Report and Order (FCC 20-136), voice service providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN are not subject to the authentication requirement of 47 CFR § 64.6301. If PJL begins operating such infrastructure, it will obtain its own Service Provider Code (SPC) token and certificate and update this filing.

4. Know Your Customer (KYC)

PJL applies the following steps to every customer before activating service:

- **Tax and identity documentation.** PJL collects an IRS Form W-9 from each customer.
- **Business verification.** PJL verifies each customer's legal existence and good standing through the applicable Secretary of State business registry.
- **Physical verification.** PJL typically performs on-site installation at the customer's place of business, which confirms the customer's physical location and operations.
- **Use case review.** Before activation, PJL discusses and documents the customer's business type and how it will use the service, including whether it will place outbound calls in volume and how those calls are made.
- **Contractual commitments.** Each customer signs PJL's service agreement and agrees to PJL's Terms of Service and Acceptable Use Policy (Section 5).

PJL does not currently use a third-party KYC or identity verification vendor; verification is performed directly by PJL.

Existing customers. PJL reviews every customer's usage monthly (Section 7). A material change in a customer's calling pattern, such as a sharp increase in outbound volume or new destinations, triggers a review of the customer's use case and, where warranted, re-verification.

High-volume outbound customer. One PJL customer is a licensed business whose staff place a high volume of short outbound business-to-business calls. Before and during service, PJL verified the customer's business license and line of business and confirmed directly with the customer how its calls are placed: agents dial manually, or copy individual numbers from a spreadsheet into their softphone. The customer does not use autodialers, predictive dialers or prerecorded messages. PJL monitors this account as part of its monthly review and its NOC channel monitoring.

5. Acceptable Use and Contractual Controls

PJL's Acceptable Use Policy prohibits the use of PJL services for illegal robocalls, unlawful caller ID spoofing, autodialed or prerecorded calls made in violation of law, and other unlawful calling. PJL's Terms of Service authorize PJL to suspend service and to terminate service for cause, including for violations of the Acceptable Use Policy or applicable law. These policies are published at pjlelcom.com and are incorporated into each customer's service agreement.

6. Technical Controls

- **Caller ID restriction.** Outbound caller ID is restricted to telephone numbers assigned to the customer's own account. Caller ID configuration is controlled solely by PJL; customers have no access to change it.
- **Concurrent call limits.** Each customer's PBX is configured with a per-tenant limit on concurrent calls sized to its legitimate needs, which limits the volume of traffic any single customer or compromised device can generate.
- **International calling.** International dialing is blocked by default. Where a customer has a business need for international calling, it is enabled only with a required outbound PIN.
- **Intrusion prevention.** PJL's PBX systems use fail2ban intrusion detection to block repeated failed authentication attempts, together with a smart firewall that filters SIP and management traffic.

- **Credential security.** SIP credentials are managed by PJJ. Following a past credential compromise (Section 8), PJJ rotated the affected credential and strengthened security controls across its platforms.

7. Traffic Monitoring and Analytics

- **Automated channel monitoring.** PJJ's network operations center runs automated monitoring of active channels on its PBX systems, giving visibility into abnormal concurrency or call activity.
- **Monthly usage review.** PJJ reviews each customer's call detail records monthly for call volume, average duration, destinations and concurrency, and compares them against the customer's documented use case.
- **Upstream carrier alerts.** ClearlyIP provides fraud and spend alerting on PJJ's account.

PJJ does not currently use a third-party call analytics vendor.

8. Response to Suspected Illegal Traffic

When PJJ identifies or is notified of suspected illegal traffic, it investigates promptly. Depending on the facts, PJJ will block the traffic, disable affected credentials, suspend the customer's outbound calling, or terminate service, and will preserve relevant call records. PJJ previously received a traceback request through its upstream carrier. PJJ determined that a compromised credential had been used to send outbound traffic from its account, disabled and rotated the credential, strengthened security across its platforms, and provided a response that was accepted as satisfactory.

9. Traceback Commitment and Point of Contact

PJJ commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement and the industry traceback consortium, and to cooperate with those entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Robocall mitigation contact	Preston Toborg, Owner and Managing Member
Telephone	(845) 470-9137
Email	preston.toborg@pjtelecom.com

FCC and industry correspondence addresses are whitelisted and monitored so that notices are received and acted on promptly.

10. Disclosure of Prior Commission Action

PJJ was subject to two FCC Enforcement Bureau Removal Orders, dated August 6, 2025 and August 25, 2025, which removed its certification from the Robocall Mitigation Database. No other law enforcement or regulatory agency was involved.

- **Basis.** The removals were based on a deficient certification: PJJ did not update its filing by the February 26, 2024 deadline and did not respond to Commission notices, which were filtered to PJJ's spam folder and not received. There were no findings of actual or suspected wrongdoing related to transmitting, encouraging, assisting or facilitating illegal robocalls or spoofing.
- **Status.** PJJ's filing was reinstated on September 5, 2025. In December 2025, in response to an Enforcement Bureau notice, PJJ updated its filing to identify its principal, disclose the removal orders, and expand its know-your-customer and traffic analytics descriptions. PJJ later withdrew its filing

voluntarily when it moved to an agent relationship with its upstream carrier and was no longer the voice service provider of record. P JL submits this filing as it resumes that role under its carrier's reseller program.

- **Final determinations.** The Removal Orders were the final determinations. No forfeiture or other penalty was imposed.
- **Corrective actions.** P JL whitelists and monitors FCC correspondence, tracks Robocall Mitigation Database deadlines on a compliance calendar, and has revised this program description to meet Commission requirements.

11. Ongoing Compliance

P JL will update its Robocall Mitigation Database filing within 10 business days of any change to the information it contains and will recertify as the Commission requires. This program description is reviewed at least annually.

I certify that the information in this Robocall Mitigation Program Description is true and correct to the best of my knowledge.



Signature

10-05-2026

Date

Preston Toborg, Owner and Managing Member
P JL Telecom LLC