

Robocall Mitigation Program Description

Version: 5, October 13, 2026

Filer: KELLER PBX LLC · FRN 0038878807 · USAC Form 499 Filer ID 839295

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Address: 15703 Pine Mountain Dr, Houston, TX 77084

1. Filer and network

Item	Value
Legal name	KELLER PBX LLC
Role	Voice service provider that originates calls for its own business customers. Not a gateway provider. Not an intermediate provider.
Service	Interconnected VoIP only (47 CFR § 9.3)
States	Texas and Arkansas
LLC formed	2026-09-14
Service start	October 2026; customer migration from the prior hosted provider (RingLogix) on 2026-10-30
Platform	Multi-tenant FusionPBX softswitch operated by the Company on Vultr (Chicago)
Upstream connection	TELNYX-VULTR-CHI → sip.telnyx.com (Telnyx LLC). Telnyx LLC is the only upstream connection on the platform.
Numbering	No OCN. The Company holds no numbers directly from NANPA or the Pooling Administrator. Every DID, including numbers ported from RingLogix, is on the Company's Telnyx LLC account.
STIR/SHAKEN	Not implemented by KELLER PBX LLC. The Company claims the 47 CFR § 64.6304(b) extension described in § 2.
Network technology	All-IP (FusionPBX to SIP to Telnyx LLC). The Company operates no non-IP network, so 47 CFR § 64.6303 does not apply.

KELLER PBX LLC originates and terminates ordinary two-way office voice for small-business tenants (including some medical clinics). It does not sell wholesale minutes, traffic aggregation, call-center blast, or autodial campaigns.

Principals, affiliates, subsidiaries, and parent companies. Principal: Isaac Murphy (President and sole member; natural person). Affiliate under common ownership: Keller Computers. No parent company. No subsidiaries.

Robocall enforcement history (prior two years): None for KELLER PBX LLC, Keller Computers, or any other entity under common ownership, management, directors, or control.

2. STIR/SHAKEN status and extension

Under 47 CFR § 64.6305(d)(1), the Company certifies that every call it originates is subject to this robocall mitigation program, and that:

It has not implemented the STIR/SHAKEN authentication framework on any portion of its network.

47 CFR § 64.6305(d)(1)(iii).

Extension claimed. 47 CFR § 64.6304(b), *Extension of implementation deadline* (eCFR, title 47 current as of October 1, 2026, <https://www.ecfr.gov/current/title-47/section-64.6304>):

(b) Voice service providers, gateway providers, and non-gateway intermediate providers that cannot obtain an SPC token. Voice service providers that are incapable of obtaining an SPC token due to Governance Authority policy are exempt from the requirements of § 64.6301 until they are capable of obtaining an SPC token. Gateway providers that are incapable of obtaining an SPC token due to Governance Authority policy are exempt from the requirements of § 64.6302(d) regarding call authentication. Non-gateway intermediate providers that are incapable of obtaining an SPC token due to Governance Authority policy are exempt from the requirements of § 64.6302(e) regarding call authentication.

Why the extension applies. KELLER PBX LLC is a new interconnected VoIP provider. It was formed on September 14, 2026, and begins providing service to customers in October 2026. It is currently incapable of obtaining an SPC token due to Governance Authority policy. Under the STI Governance Authority's SPC Token Access Policy (Policy Decision 001, version 1.2), the STI Policy Administrator clears a provider for access to STI certificates only if the provider (1) has a current FCC Form 499-A on file with the Commission, (2) has been assigned an Operating Company Number (OCN), and (3) has certified to the Commission that it has implemented STIR/SHAKEN or complies with the robocall mitigation program requirements, and is listed in the Robocall Mitigation Database. The policy also provides alternatives for toll-free Responsible Organizations (proof of payment of the annual Resp Org fee in place of a Form 499-A, a Resp Org ID in place of an OCN, and a path for non-service-provider Resp Orgs with direct access to toll-free numbers). Those alternatives do not currently apply to the Company, which is not currently a Resp Org and has no Resp Org ID. If the Company becomes a Resp Org, it will update this filing within 10 business days (47 CFR § 64.6305(d)(5)). As of this filing, the Company does not meet the criteria. It has not been assigned an OCN, which by itself prevents it from obtaining a token. Its only FCC Form 499-A filing to date is its new-filer registration (Filer ID 839295). Its first annual Form 499-A, reporting its revenue for calendar year 2026, is due April 1, 2027. This is its first Robocall Mitigation Database certification, so it is not yet listed in the Database. The Company will be capable of obtaining an SPC token once it meets all of the Governance Authority's criteria, including a Form 499-A that the STI Policy Administrator accepts as current. In its September 29, 2026 annual reevaluation (DA 26-1050), the Wireline Competition Bureau found that this extension remains necessary without modification while the Commission considers whether to repeal or narrow it.

Steps the Company is taking to obtain an SPC token. (1) By October 20, 2026, the Company will send written inquiries to NECA about obtaining an OCN as an interconnected VoIP provider, and to the STI Policy Administrator about whether its Form 499-A registration satisfies the current-Form 499-A requirement. (2) Within 30 days after NECA confirms its requirements, or by December 31, 2026 if NECA has not responded, the Company will apply to NECA for an OCN. If NECA requires a Commission authorization first, the Company will apply for that authorization within the same period and will apply for the OCN within 30 days after the authorization is granted. (3) Within 30 days after it meets all of the Governance Authority's criteria, including a Form 499-A that the STI Policy Administrator accepts as current, the Company will register with the STI Policy Administrator and apply for an SPC token. If the STI Policy Administrator does not treat the Company's

registration filing as a current Form 499-A, the Company expects to meet that criterion when it files its first annual Form 499-A, due April 1, 2027. (4) Within 60 days after its SPC token is issued, the Company will diligently pursue and obtain an STI certificate and begin signing the calls it originates, either on its own platform or through Telnyx LLC acting as a third-party authentication service that signs with the Company's certificate under a written agreement that meets 47 CFR § 64.6301(b). The Company will update this filing within 10 business days after it is assigned an OCN, after it obtains an SPC token, after signing begins, and after any other change to the information in this filing (47 CFR § 64.6305(d)(5)). It will also update its CORES registration within 10 business days of any change to that registration (47 CFR § 1.8002(b)(2)).

The Company does not base this extension on the absence of directly assigned numbering resources or on any other provider's authentication of its calls. Telnyx LLC's signing of calls with Telnyx LLC's own certificate is not treated as KELLER PBX LLC having implemented STIR/SHAKEN.

3. Know your customer

47 CFR § 64.1200(n)(4) (eCFR, <https://www.ecfr.gov/current/title-47/section-64.1200>):

Take affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic.

47 CFR § 64.6305(d)(2)(ii) requires this program description to explain how the Company meets that duty.

3.1 Who is accepted

Tenants are **ordinary small-business office phone customers only**.

The Company **does not accept** call centers, autodialers, or resellers. Accepting any such customer would require a new written review and an update to this program first, followed by an update to this filing within 10 business days.

A "customer" is the legal entity that receives a FusionPBX tenant. Employees and softphone users of that tenant are not separate originating customers.

3.2 Checks before service

Before a tenant is provisioned or a number is placed:

1. **Legal entity** — confirm the entity through a Texas Secretary of State or Arkansas Secretary of State lookup (as applicable). Reject a package that does not match.
2. **Billing identity** — legal name, EIN or other taxpayer ID (not an SSN unless that is the only ID), billing street address (no P.O. box as the sole address), officer or owner name, direct phone, and monitored email.
3. **Number rights** — signed Letter of Authorization **plus** the losing carrier's customer record (CSR or bill) **or** the port confirmation showing the same legal name.
4. **Use case** — ordinary two-way office voice. Expected simultaneous-call count. Written confirmation that the tenant will not originate autodialed, prerecorded, or abandoned-call campaigns.
5. **Caller ID** — outbound caller ID limited to numbers on the Telnyx LLC account that are assigned or ported to that tenant (forwarded calls: see § 4).
6. **911** — registered location on file and a signed 911 acknowledgment before live service.
7. **Acceptable use** — signed customer agreement that includes this program's acceptable-use terms.

Incomplete packages are not enabled.

3.3 Monitoring and suspend-and-review

Isaac Murphy reviews FusionPBX call detail records at least weekly and on any alert, looking for:

- unusual volume compared with the intake use case;
- many simultaneous calls;
- very short calls;
- high unanswered or abandoned rates;
- unauthorized caller ID (a number not assigned to that tenant, other than forwarded calls that meet § 4).

Suspend-and-review: if any of those appear, or if a traceback request, Commission notice, Telnyx LLC alert, or customer complaint implicates a tenant, the Company **suspends that tenant's outbound calling immediately** (911 and 933 keep working; see below), reviews call records and the customer file, and restores outbound calling only after a clean review. Material acceptable-use or know-your-customer violations end the tenant's service.

Records are kept for the customer relationship plus two years, and longer if a traceback or Commission matter is open.

911 is never blocked. No suspension, caller-ID rule, do-not-originate rule, or other blocking described in this program applies to calls to 911 (47 CFR §§ 64.6305(g)(5)(i), 64.1200(k)(5)) or, as Company policy, to 933 (the 911 test number). The Company suspends a tenant by turning off that tenant's outbound calling only. Calls to 911 and 933 use a separate emergency route in every tenant, so calls to 911 and 933, and inbound calls, keep working during any suspension. The Company's caller-ID and do-not-originate rules are not applied to calls to 911 or 933, so the Company does not block or reject a 911 call because of the number it presents. The Company also makes all reasonable efforts to ensure that it does not block calls from public safety answering points and government emergency numbers (47 CFR §§ 64.6305(g)(5)(ii), 64.1200(k)(6)).

3.4 Know your upstream provider

47 CFR § 64.6305(d)(2)(ii) requires this program description to describe "any procedures in place to know its upstream providers."

The Company has one upstream provider: **Telnyx LLC** (FRN 0018998724), reached only through gateway TELNYX-VULTR-CHI (sip.telnyx.com). Telnyx LLC has its own certification in the Robocall Mitigation Database (RMD0001645).

The Company confirms that Telnyx LLC's filing appears in the Robocall Mitigation Database, and has not been removed, before it begins exchanging traffic with that provider, and again at least once a year during the program review that precedes the March 1 recertification. The Company does not accept traffic from a provider whose filing does not appear in the Database. If Telnyx LLC's filing were removed, the Company would stop accepting traffic from it.

The Company's service from Telnyx LLC is governed by Telnyx LLC's Terms and Conditions of Service, which require the Company to comply with Telnyx LLC's Acceptable Use Policy and to respond promptly and in good faith to traceback requests. Any new upstream provider must pass the same checks, and this program is updated first.

4. Number-assignment controls

Control	Practice
Inventory	All DID's are on the Telnyx LLC account (new Telnyx LLC inventory or ports from RingLogix onto that account).

Control	Practice
Assignment	A number is placed on a tenant only after the know-your-customer checks and a 911 location are on file.
Caller ID	Outbound From / PAI must be a DID assigned to that tenant. Exception: when the platform forwards or simultaneously rings an inbound call to a tenant DID out to an external number, the outbound leg may carry the original caller's number in From / PAI only if the INVITE also carries a Diversion or History-Info header identifying the tenant DID that was called. No other number is accepted, and tenants cannot set "any caller ID." Calls to 911 and 933 are never blocked (§ 3.3).
Port-in	LOA plus losing-carrier CSR or bill, or port confirmation, matched to the Secretary of State legal name.
Port-out	Standard port-out; no extra delay.
Reclamation	On disconnect, the number is removed from the tenant and from outbound caller ID.
Inbound-only	Subscriber-requested inbound-only numbers go on the do-not-originate list and off outbound routes.

5. Traceback (24 hours)

47 CFR § 64.1200(n)(1) (eCFR, <https://www.ecfr.gov/current/title-47/section-64.1200>):

Upon receipt of a traceback request from the Commission, civil law enforcement, criminal law enforcement, or the industry traceback consortium, the provider must fully respond to the traceback request within 24 hours of receipt of the request. The 24-hour clock does not start outside of business hours, and requests received during that time are deemed received at 8 a.m. on the next business day. If the 24-hour response period would end on a non-business day, either a weekend or a Federal legal holiday, the 24-hour clock does not run for the weekend or holiday in question, and restarts at 12:01 a.m. on the next business day following when the request would otherwise be due. For example, a request received at 3 p.m. on a Friday will be due at 3 p.m. on the following Monday, assuming that Monday is not a Federal legal holiday. For purposes of this paragraph (n)(1), business day is defined as Monday through Friday, excluding Federal legal holidays, and business hours is defined as 8 a.m. to 5:30 p.m. on a business day. For purposes of this paragraph (n)(1), all times are local time for the office that is required to respond to the request.

47 CFR § 64.6305(a)(2) and (d)(2)(iii) require the same 24-hour commitment in this program and in the Robocall Mitigation Database certification.

Commitment: KELLER PBX LLC will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (the Industry Traceback Group), and will cooperate with those entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Contact: Isaac Murphy, President · (409) 223-8317 · isaac@kellerpbx.com. Isaac Murphy is the Company's traceback contact. Traceback requests sent to isaac@kellerpbx.com or (409) 223-8317 generate an immediate alert, including voicemail push notification, on the contact's mobile phone. Isaac Murphy receives traceback

alerts directly and responds to each request in full within the 24-hour period in 47 CFR § 64.1200(n)(1). If a second contact is added, this program and the Database filing will be updated.

Process: log the request; pull FusionPBX call records, the tenant ID, and Telnyx LLC call records and SIP traces; identify the tenant and station; return the call-path information (whether the Company originated the call, the upstream or downstream hop, and timestamps) and, where the request requires it, the identity and contact information of the originating customer; never call content. If illegal origination is confirmed or reasonably suspected, block the numbers involved, suspend the tenant's outbound origination (§ 3.3), and preserve logs.

6. Blocking and Commission notices

Do-not-originate, invalid, unassigned, and unallocated numbers — 47 CFR § 64.1200(o):

A voice service provider must block any calls purporting to originate from a number on a reasonable do-not-originate list. A list so limited in scope that it leaves out obvious numbers that could be included with little effort may be deemed unreasonable. The do-not-originate list may include only:

- (1) Numbers for which the subscriber to the number has requested that calls purporting to originate from that number be blocked because the number is used for inbound calls only;
- (2) North American Numbering Plan numbers that are not valid;
- (3) Valid North American Numbering Plan Numbers that are not allocated to a provider by the North American Numbering Plan Administrator; and
- (4) Valid North American Numbering Plan numbers that are allocated to a provider by the North American Numbering Plan Administrator, but are unused, so long as the provider blocking the calls is the allocatee of the number and confirms that the number is unused or has obtained verification from the allocatee that the number is unused at the time of blocking.

On FusionPBX the Company blocks outbound calls whose caller ID is invalid, not assigned to the tenant (except forwarded calls that meet § 4), inbound-only, or in the Company's unassigned inventory (a Company caller-ID policy). These blocks never apply to calls to 911 or 933 (§ 3.3). The Company does not rely on Telnyx LLC for the blocking described in this section; any network-level blocking Telnyx LLC applies is in addition to it.

Acting on Commission notices — 47 CFR § 64.1200(n)(2) (opening duty):

Upon receipt of a Notice of Suspected Illegal Traffic from the Commission through its Enforcement Bureau, take the applicable actions with respect to the identified traffic described in paragraphs (n)(2)(i) through (iii) of this section.

The Company investigates within the Enforcement Bureau's deadline, blocks or stops the identified traffic and substantially similar traffic if the Company originated it, reports as the rule requires, and follows any Initial or Final Determination Orders. The Company also monitors EB Docket No. 22-174 for Final Determination Orders that require downstream blocking under § 64.1200(n)(3).

7. Analytics and Telnyx LLC authentication

47 CFR § 64.6305(d)(2)(ii) requires naming the analytics systems used and any third-party analytics vendor.

- The Company does not run its own STIR/SHAKEN analytics engine.
- PSTN-path analytics and network-level robocall controls are those of **Telnyx LLC**, the only upstream provider.

- FusionPBX call-record review (volume, simultaneous calls, short calls, unanswered rate, unauthorized caller ID) is the Company-side analytics.

Calls the Company originates are handed to Telnyx LLC on TELNYX-VULTR-CHI (sip.telnyx.com). Telnyx LLC determines whether and how to authenticate them under its own STIR/SHAKEN arrangements. The Company does not set or represent attestation levels, and it does not treat Telnyx LLC's signing as its own implementation (§ 2). The Company verifies each customer's right to use its numbers (§ 3.2) and provides that information to Telnyx LLC on request. On 2026-09-25 the Company asked Telnyx LLC for a written description of how it authenticates the Company's traffic.

No tenant can set attestation. The Company does not advertise that it is STIR/SHAKEN-certified.

8. Acceptable use

The customer agreement prohibits illegal robocalls, spoofing, Truth in Caller ID violations (47 U.S.C. § 227(e); 47 CFR § 64.1604), TCPA and Telemarketing Sales Rule violations, call-center, autodial, or reseller use without a prior written review and program update, and originating calls for unidentified third parties. Outbound origination may be suspended without notice under § 3.3. A suspension never blocks calls to 911 or 933 (§ 3.3).

9. Program owner, updates, and recertification

Isaac Murphy, President, owns this program and reviews it at least once a year before the annual recertification.

- **Updates to this filing:** within 10 business days of any change to the information the Company must report (47 CFR § 64.6305(d)(5)).
 - **CORES:** the Company updates its CORES registration within 10 business days of any change to that information (47 CFR § 1.8002(b)(2)).
 - **Annual recertification:** on or before March 1 each year (47 CFR § 64.6305(h)). The first annual recertification is due on or before March 1, 2027; the recertification filing window opens February 1.
 - **Filing fee:** the Commission has adopted a \$100 Robocall Mitigation Database filing fee for initial filings and annual recertifications (47 CFR § 1.1105, as amended by FCC 24-135), but that fee is not yet in effect. The Company will pay any Robocall Mitigation Database filing or recertification fee required by 47 CFR § 1.1105 once it applies.
 - **Regulatory changes:** the Company monitors WC Docket Nos. 17-97 and 24-213. If the Commission eliminates or changes the § 64.6304(b) extension, or adopts a temporary extension for providers obtaining an SPC token, the Company will review its status, update this filing within 10 business days of any resulting change in the information it must report (47 CFR § 64.6305(d)(5)), and meet any new implementation deadline.
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10. Certification

This program description is submitted with the Company's Robocall Mitigation Database certification, signed by Isaac Murphy, President, in the Database under 47 CFR § 1.16.

Sources

- 47 CFR § 64.6304(b), <https://www.ecfr.gov/current/title-47/section-64.6304>

- 47 CFR § 64.6305, <https://www.ecfr.gov/current/title-47/section-64.6305>
- 47 CFR § 64.6301, <https://www.ecfr.gov/current/title-47/section-64.6301>
- 47 CFR § 64.1200(k), (n), (o), <https://www.ecfr.gov/current/title-47/section-64.1200>
- 47 CFR § 1.8002(b), <https://www.ecfr.gov/current/title-47/section-1.8002>
- STI Governance Authority, Policy Decision 001: SPC Token Access Policy, version 1.2, <https://sti-ga.atis.org/policy-decisions-binder/>
- Wireline Competition Bureau, DA 26-1050 (Sept. 29, 2026), <https://docs.fcc.gov/public/attachments/DA-26-1050A1.pdf>
- Robocall Mitigation Database External Filing Instructions (July 2026), <https://www.fcc.gov/sites/default/files/rmd-instructions.pdf>