

CTX Technology, LLC

Robocall Mitigation Program Description

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1. Provider and responsible contact

Legal name: CTX Technology, LLC

FRN: 0039034186

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Responsible contact: Anthony W. Wilson, Founder

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2. Scope and service arrangement

CTX Technology, LLC (CTX) is a new hosted voice service provider operating through the SkySwitch reseller platform. CTX provides service under its own name and uses SkySwitch-supported tools and procedures. This program applies to all CTX voice customers and outbound voice traffic. It establishes the practices CTX commits to implement from commencement of service; it does not assert a history of completed monitoring, investigations, or enforcement.

CTX relies on its upstream service arrangement for network-level call processing and authentication. CTX does not claim that it has independently implemented STIR/SHAKEN or obtained its own signing credentials. Any certification of inability to implement STIR/SHAKEN must reflect the actual infrastructure controlled by CTX and the applicable FCC requirements. This program does not itself establish an exemption. CTX will confirm its account-specific authentication arrangement and maintain its RMD certification accordingly.

3. Customer identification and acceptable use

Before activating service, CTX will obtain and review the customer's legal or business name, billing and service addresses, responsible person, working contact information, and intended calling use. CTX will compare the information with reasonably available business information, request supporting documentation when needed, and resolve material discrepancies before activation. CTX will retain the verification results and decline accounts whose identity or intended lawful use cannot reasonably be established.

CTX prohibits illegal robocalls, unlawful caller ID spoofing, fraud, and activity contrary to applicable law or SkySwitch service requirements. CTX will communicate these restrictions to customers and require cooperation with investigations. CTX will review authorization for requested outbound caller ID numbers and reassess material changes in customer ownership or use. Automated, prerecorded, telemarketing, or high-volume calling requests will receive additional scrutiny before activation for lawful use and consistency with SkySwitch's terms and supported services. CTX will not knowingly enable unlawful campaigns.

4. Upstream mitigation and provider diligence

SkySwitch's published STIR/SHAKEN Compliance guidance describes upstream monitoring of outbound voice traffic, including software-based real-time monitoring, reporting and alerts for invalid or unallocated calling numbers, and investigation with warnings or termination where unlawful calling is identified. CTX relies on these documented upstream measures to the extent applicable to its service and will cooperate promptly with upstream investigations and corrective actions. These are upstream-provider capabilities, not an assertion that CTX

operates an independent monitoring system.

CTX will confirm the underlying legal provider and applicable RMD registration, maintain current support and abuse-escalation channels, and verify the account-specific responsibilities for authentication, records, traceback assistance, and restrictions. CTX will review material provider notices and changes and reassess credible compliance concerns. An upstream filing does not replace CTX's own filing or mitigation responsibilities.

5. CTX traffic review and analytics

CTX does not deploy a separate independent analytics platform or retain an independent outbound analytics vendor. CTX will use available SkySwitch call-detail records, reports, upstream notices, account information, and customer complaints for manual review. CTX will review available activity at least weekly during initial operations and promptly after credible complaints or alerts. Indicators include unexpected volume increases, repeated short calls, unusual failure patterns, sequential dialing, and calling inconsistent with stated customer use. Such indicators prompt investigation rather than automatically establishing illegality.

CTX will seek SkySwitch technical assistance where review exceeds its available tools and will not claim access to unavailable analytics, reports, or controls. CTX will document any subsequently adopted analytics system or vendor and revise this program as required.

6. Nomorobo and inbound spam protection

SkySwitch offers Nomorobo-powered inbound spam detection. CTX will use that protection where available and enabled for the customer's service, following SkySwitch-supported configuration and routing procedures. CTX does not represent that the feature is enabled for every number. Nomorobo is identified here as an upstream-platform inbound spam-protection feature, not CTX's independent outbound analytics vendor. Incoming-call filtering does not establish the legality of CTX customer-originated calls or replace outbound mitigation.

7. Investigation and corrective action

On receiving an abuse report, traceback request, or credible indication of unlawful calling, CTX will preserve available relevant records, identify the affected customer and numbers, review available activity, and obtain information from the customer and SkySwitch as appropriate. CTX will promptly escalate suspected unlawful traffic through supported upstream channels and document findings, communications, and actions.

CTX will take reasonable, timely steps to stop illegal traffic, using available authorized controls or requesting upstream restrictions, suspension, or termination consistent with law and service terms. CTX will not knowingly permit confirmed illegal calling to continue. CTX will verify remediation before restoring restricted service and apply enhanced review or termination to recurrence. CTX will not bypass platform controls or use unsupported technical methods.

8. Traceback cooperation

CTX commits to respond fully and within 24 hours to traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate in investigating and stopping illegal robocalls using its service. Anthony W. Wilson is responsible for coordinating the response through the contact information above.

CTX will monitor designated contact channels daily, including weekends and holidays, and arrange coverage during unavailability. CTX will promptly identify relevant customer and upstream information, preserve records, supply available requested information through appropriate secure channels, and coordinate with SkySwitch for upstream-held records. An acknowledgment alone is not a full response. CTX will promptly explain information

limitations and continue pursuing requested material.

9. Records, implementation, and oversight

CTX will maintain access-controlled records of customer verification, complaints, traceback correspondence, investigations, and mitigation actions. CTX will preserve available calling records relevant to incidents or preservation requests and coordinate upstream preservation where needed. CTX does not claim retention or access beyond records actually available through its service.

Anthony W. Wilson is responsible for implementing this program, making personnel aware of their duties, and reviewing the program at least annually and after material incidents or service changes. CTX will implement the stated measures before relying on this description in a certification, maintain an accurate RMD filing, and complete required updates and recertifications. Practices that change will be reflected in the program and filing as required.

10. Regulatory and technical references

Regulatory basis: 47 CFR § 64.6305, Robocall mitigation and certification, including the explanation of lack of control over necessary network infrastructure addressed in § 64.6305(d)(2)(i), where factually applicable. This document does not replace the separate provider certifications or determine CTX's STIR/SHAKEN implementation obligation.

Technical reference: SkySwitch, STIR/SHAKEN Compliance, <https://docs.skyswitch.com/en/articles/849-stir-shaken-compliance>. Filing guidance: SkySwitch, Robocall Mitigation Database Filing Requirements, <https://docs.skyswitch.com/en/articles/1080-robocall-mitigation-database-filing-requirements>. Feature availability and applicability remain subject to the actual account and service arrangement.