Robocall Mitigation Program Description

11384422 Canada Inc., doing business as fonoUC and QVOICE
FCC Registration Number (FRN): 0039056270

1. Filer Information

Legal name	11384422 Canada Inc.
Business names (DBA)	fonoUC; QVOICE
FRN	0039056270
Other FRNs	None
Previous business names	None
Business address	138 Smithwood Dr, Etobicoke, Ontario M9B 4S4, Canada
Provider type	Foreign voice service provider (Canada)
Role in the call chain	Voice service provider without a STIR/SHAKEN obligation
STIR/SHAKEN status	Not implemented (Certification Option 3)
Operating Company Number	None
Robocall mitigation contact	Nenad Corbic, Director, Network Operations
Contact telephone / email	+1 647 947 0897 / info@fonouc.com

2. Principals, Affiliates, Subsidiaries, and Parent Companies

Principal: Nenad Corbic, Director, 11384422 Canada Inc. The company has no parent company, no subsidiaries, and no affiliates that provide voice service.

3. Description of Business and Role in the Call Chain

11384422 Canada Inc. (fonoUC) is a Canadian corporation that operates QVOICE, a hosted business phone, unified communications, and contact center platform. The company provides service to business customers directly and through managed service provider and reseller partners that offer the service under their own brand. fonoUC does not provide residential service and does not sell wholesale voice termination to other carriers.

fonoUC originates calls on behalf of its business customers. Calls destined for the United States are delivered to United States carrier partners that act as the gateway and downstream providers for that traffic. fonoUC does not accept calls from other voice service providers for transit to the United States.

4. STIR/SHAKEN Status

fonoUC is a foreign voice service provider. It does not operate network facilities in the United States, has not obtained a Service Provider Code token under the United States STIR/SHAKEN governance framework, and has not implemented STIR/SHAKEN authentication on any portion of its network. Under 47 CFR § 64.6305(d)(2)(i), the requirement to identify an extension under § 64.6304 or to explain a lack of control over network infrastructure applies only to voice service providers that are not foreign voice service providers. All calls fonoUC originates are subject to the robocall mitigation program described below. Downstream United States providers may authenticate fonoUC traffic in accordance with their own

obligations.

fonoUC plans to implement STIR/SHAKEN authentication for its calls to the United States through a United States carrier partner acting as its third party authentication service. When fonoUC begins authenticating calls, it will update this filing within 10 business days to reflect its new implementation status.

5. Reasonable Steps to Avoid Originating Illegal Robocalls

5.1 Customer vetting for new and renewing customers. Before enabling outbound calling, fonoUC verifies the identity and legitimacy of each customer, including:

- legal business name, business address, and a named, contactable account owner;
- verification of the business through public business registries, the business website, or equivalent records;
- a signed service agreement and acceptance of the fonoUC acceptable use policy;
- a verified payment method on file.

Reseller and managed service provider partners are contractually required to perform equivalent vetting of their end customers and to provide fonoUC with customer identity information on request. Customer information is reviewed again at renewal and whenever account ownership or usage materially changes.

5.2 Caller ID controls. fonoUC restricts outbound caller ID on its platform to telephone numbers assigned to the customer by fonoUC or numbers the customer has demonstrated it is authorized to use. Customers may not present arbitrary or unverified caller ID, and fonoUC does not permit spoofing of numbers the customer does not control.

5.3 Contractual controls. The fonoUC acceptable use policy and partner agreements prohibit illegal robocalls, unlawful spoofing, calls made without legally required consent, and any use of the service that violates the Telephone Consumer Protection Act, the Truth in Caller ID Act, or the Canadian Unsolicited Telecommunications Rules. Violation allows fonoUC to suspend or terminate service immediately.

5.4 Traffic monitoring and limits. fonoUC applies per account limits on concurrent calls and call rates, and monitors traffic for patterns associated with illegal robocalling, including sudden volume increases, high volumes of very short calls, low answer rates, and unusual destination patterns. Outbound contact center campaign capability is enabled only for vetted customers, who must comply with all applicable consent and do not call requirements.

5.5 Response to suspicious traffic. When monitoring, a traceback request, a complaint, or a downstream provider notification indicates that a customer may be originating illegal robocalls, fonoUC investigates promptly, and suspends or blocks the traffic and the account where appropriate. Customers found to be originating illegal robocalls are terminated.

6. Traceback Cooperation

fonoUC commits to respond fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and to cooperate with these entities in investigating and stopping any illegal robocallers that use its service to originate calls. Traceback requests may be directed to the robocall mitigation contact listed in Section 1.

7. Program Maintenance

fonoUC reviews this program at least annually and whenever its services or call routing change, and will update its Robocall Mitigation Database filing within 10 business days of any change to the information it contains.

8. Certification

11384422 Canada Inc. certifies that all calls it originates on its network are subject to the robocall mitigation program described in this document, that any prior certification has not been removed by Commission action, and that it has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

Nenad Corbic
Director, 11384422 Canada Inc.
Date: October 28, 2026