Robocall Mitigation Program Description

ONEWAYNETWORKS Technologies Private Limited (d/b/a ownpbx)
Filed pursuant to 47 CFR § 64.6305 | Date: November 3, 2026

1. Provider Information

- **Legal name:** ONEWAYNETWORKS Technologies Private Limited
- **Doing business as:** ownpbx
- **Country of incorporation:** India (private limited company, incorporated September 2026)
- **Registered office:** B-52, UGF, Kesho Ram Park, Uttam Nagar, New Delhi – 110059, India
- **Provider type:** Foreign voice service provider
- **Services:** Multitenant cloud PBX (hosted business telephony) and AI voice agent services for business customers
- **Robocall mitigation contact:** Ashish Kushwaha, Director — ashish@ownpbx.in — +91 98119 74682

2. STIR/SHAKEN Implementation Status

ownpbx certifies to **no STIR/SHAKEN implementation**. As a foreign voice service provider, ownpbx is not subject to 47 CFR § 64.6301. It holds no Operating Company Number (OCN), has no direct access to U.S. numbering resources, and has not been issued an SPC token by the STI Policy Administrator, so it cannot sign calls itself. All ownpbx traffic that carries U.S. NANP caller IDs is delivered to its U.S. upstream carriers, **Twilio, Telnyx and 382 Communications**, all listed in the Robocall Mitigation Database, which authenticate those calls under their own STIR/SHAKEN certificates. ownpbx sends traffic to the U.S. only through upstream providers that appear in the Robocall Mitigation Database. If ownpbx obtains an OCN and SPC token, it will implement STIR/SHAKEN and update this filing within 10 business days.

3. Reasonable Steps to Avoid Originating Illegal Robocalls

3.1 Know-Your-Customer (KYC) at onboarding

- Every customer must be a business. Before an account can make outbound calls, ownpbx collects the legal entity name, registration number, registered address, authorized contact and a description of the intended calling use.
- ownpbx verifies identity and business documents (for example, company registration certificate, tax registration, government ID of the authorized signatory) and checks the business website and contact details.
- Applicants are screened against the FCC's list of providers removed from the Robocall Mitigation Database, FCC/FTC enforcement actions, and industry traceback reports. Applicants whose business is primarily unsolicited outbound telemarketing, or who give incomplete or inconsistent information, are rejected.
- Payment is taken only through verified methods in the customer's business name. Anonymous or prepaid-only accounts with no verified identity are not allowed to make U.S. outbound calls.

3.2 Caller ID authorization

- Customers may only present U.S. caller IDs that ownpbx has assigned to them or that they have proven they are authorized to use (for example, a carrier invoice or letter of authorization for the number).
- Caller ID is enforced on ownpbx's platform at the trunk/tenant level. Calls with an unauthorized, invalid, unallocated or spoofed caller ID are blocked before they leave the platform.

3.3 Contract terms

- ownpbx's terms of service prohibit illegal robocalls, caller ID spoofing, and any calling that violates the Telephone Consumer Protection Act (TCPA), the Truth in Caller ID Act, or the Telemarketing Sales Rule.
- ownpbx may immediately suspend or terminate any customer found to be sending illegal or suspicious traffic, and customers must cooperate with traceback requests.

3.4 Limits and traffic monitoring

- New accounts start with conservative limits on concurrent calls, calls per second and daily outbound volume. Limits are raised only after review of the customer's calling history.
- ownpbx monitors call records for patterns associated with robocalling, including high call volumes, very short average call duration, low answer rates, sequential or random dialing, rapid caller ID rotation, and sudden volume spikes. Automated alerts flag such patterns for review, and traffic is paused pending investigation when they are found.

3.5 AI voice agent controls

- Outbound calling by AI voice agents is disabled by default and enabled only for verified customers with a documented lawful use (for example, appointment reminders or calls to existing customers who have consented).
- Customers using AI agents for outbound calls must confirm in writing that they have the prior express consent required by the TCPA for artificial or prerecorded voice calls. AI agents identify the calling business at the start of each call, and per-campaign volume limits apply.

3.6 Upstream and downstream providers

- ownpbx does not accept wholesale or transit traffic from other carriers for delivery to the U.S.
- ownpbx routes U.S.-bound traffic only through upstream providers listed in the Robocall Mitigation Database and checks their listing status periodically.

4. Traceback Commitment

ownpbx commits to respond fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium (the Industry Traceback Group), and to cooperate with these entities in investigating and stopping any illegal robocallers that use its service to originate calls. Traceback requests are handled by the robocall mitigation contact named above. When a traceback identifies an ownpbx customer, ownpbx identifies the customer from its call records, investigates, and suspends the customer's outbound calling where the traffic appears illegal.

5. Record Keeping and Review

ownpbx keeps call detail records and customer KYC records so that it can answer traceback requests and support investigations. It reviews this program at least once a year and whenever its services or network change. It will update its Robocall Mitigation Database filing within 10 business days of any change to the

information in it, and will recertify each year as the Commission requires.

Ashish Kushwaha
Director, ONEWAYNETWORKS Technologies Private Limited (d/b/a ownpbx)