ROBOCALL MITIGATION PLAN AND COMPLIANCE CERTIFICATION

Provider Name: Novis Nexus LLC
Form 499 ID: 839423
Operating Company Number (OCN): Pending (In Process)
Provider Type: Gateway Provider / Interconnected VoIP Provider
Date of Submission: November 05, 2026

1. SYSTEM OVERVIEW & REASONABLE STEPS

Novis Nexus LLC ("the Company") is a U.S.-based VoIP provider operating primarily as a Gateway Provider for international traffic. The Company receives voice traffic from foreign service providers (including clients located in Pakistan and other international jurisdictions) and terminates or routes this traffic to the U.S. Public Switched Telephone Network (PSTN).

The Company certifies that it has implemented a robust, proactive, and comprehensive Robocall Mitigation Plan. The Company takes all reasonable steps to avoid originating, processing, or transmitting illegal robocalls, strictly complying with the FCC's Second Report and Order (FCC 23-18) and related gateway provider regulations.

2. STIR/SHAKEN IMPLEMENTATION STATUS

- **Implementation Status:** The Company is fully committed to the STIR/SHAKEN cryptographic authentication framework.
- **Gateway Provider Obligations:** As a Gateway Provider receiving traffic from foreign entities, the Company complies with the FCC's mandate to apply STIR/SHAKEN caller ID authentication to all unauthenticated foreign-originated SIP traffic that utilizes U.S. North American Numbering Plan (NANP) resources, to the extent technically feasible.
- **Token & OCN Status:** The Company has successfully obtained its FCC Form 499 ID and is actively in the process of securing its Operating Company Number (OCN) to obtain full STIR/SHAKEN cryptographic certificates from the Governance Authority. Until the OCN is finalized and token authentication is active, the Company relies on the rigorous downstream/upstream mitigation protocols detailed below.

3. KNOW YOUR CUSTOMER (KYC) & UPSTREAM CARRIER DILIGENCE

Because the Company serves international clients (including providers in Pakistan and other foreign markets), strict **Know Your Customer (KYC)** protocols are enforced to eliminate illegal traffic at the ingestion point:

- **Identity Verification:** The Company conducts thorough background checks on all foreign upstream clients, verifying their corporate registration, physical business addresses, ownership structures, and regulatory standing in their respective home countries.
- **Contractual Safeguards:** All service agreements include mandatory, non-negotiable clauses prohibiting the transmission of illegal robocalls, spoofed CLI (Caller Line Identification), or fraudulent voice traffic into the United States.
- **Credit & Traffic Scrutiny:** The Company analyzes expected traffic volumes, use cases (e.g., enterprise, conversational, or wholesale), and payment methods to screen out high-risk entities.

4. TRAFFIC MONITORING & REAL-TIME ANALYTICS

The Company employs advanced automated monitoring tools and analytics engines to detect, isolate, and block illegal robocall patterns before they cross into the U.S. network:

- **High-Volume & Short-Duration Alerts:** The Company monitors for classic robocall signatures, such as high bursts of calls from a single source, extremely short Average Duration of Calls (ACD), and low Answer To-Seizure Ratios (ASR).
- **Invalid & Unallocated Number Blocking:** The Company automatically blocks traffic featuring invalid U.S. numbers, unallocated NANP prefixes, or numbers listed on the Do-Not-Originate (DNO) registry.
- **Source-Based Rate Limiting:** Automated thresholds are placed on upstream trunks to prevent sudden, unauthorized spikes in call volumes that indicate automated dialing system abuse.

5. CALL BLOCKING & FCC KNOW-BEFORE-YOU-BLOCK COMPLIANCE

- **Mandatory Blocking:** The Company immediately blocks traffic upon notification from the FCC, the Industry Traceback Group (ITG), or law enforcement that a specific upstream client is transmitting illegal traffic.
- **Notification and Grievance:** In accordance with FCC regulations, if traffic is blocked based on analytics, the Company provides immediate SIP error codes (e.g., SIP 603 or

608) to notify the upstream provider, allowing a mechanism for legitimate callers to resolve false positives promptly.

6. PARTICIPATION IN TRACEBACK REQUESTS

- **Full Cooperation:** The Company fully cooperates with all traceback requests from the FCC, the Federal Trade Commission (FTC), state Attorneys General, and the officially designated **Industry Traceback Group (ITG)**.
- **Rapid Response Time:** The Company maintains a dedicated, 24/7 regulatory compliance contact to respond to and resolve traceback inquiries within the legally mandated **24-hour response window**.
- **Upstream Accountability:** If a traceback inquiry leads to a specific foreign client, the Company immediately investigates that client. Failure by the client to justify the traffic or remediate the issue results in immediate suspension or termination of service.

7. COMPLIANCE ENFORCEMENT & PLAN AMENDMENTS

- **Disciplinary Action:** The Company maintains a zero-tolerance policy for illegal robocalling. If an international client violates these compliance guidelines, the Company will implement strict traffic throttling, trunk blocking, or total contract termination.
- **Continuous Updates:** This Robocall Mitigation Plan is a living document. It will be reviewed at least annually and updated immediately upon the acquisition of the Company's OCN and STIR/SHAKEN certificates to accurately reflect operational changes.