ASYLUM X CYBERSECURITY DIVISION INC.

Public Robocall Mitigation Program Description — Draft for Verification

Legal name: Asylum X Cybersecurity Division Inc. (AXCD)

FCC FRN: 0036469823

RMD Filer ID: Pending assignment

Address: 17730 NW 14th Pl, Miami, FL 33169

Compliance officer: Trevan Smith, President/CEO

Traceback contact: compliance@asylumxcd.com | 786-227-0498

Business model: Retail hosted VoIP services under AXCD brand, using SkySwitch as wholesale platform

REVIEW STATUS: This is a proposed public-facing program description. AXCD must verify implementation, the applicable STIR/SHAKEN certification, and FCC classification before uploading or certifying. This document does not itself establish compliance.

1. Scope and oversight

AXCD's program is designed to prevent its hosted business voice services from being used for illegal robocalls, fraudulent calls, and unlawful caller-ID spoofing. The President/CEO oversees the program, designates personnel to manage complaints and traceback requests, and coordinates network-level actions with SkySwitch.

2. Customer identity and use-case review

Before authorizing outbound service, AXCD's procedure is to validate the business name, address, authorized representative, reliable contact information, intended calling use, and customer authority to use telephone numbers and caller IDs. High-volume and higher-risk use cases receive enhanced review. Accounts that cannot be adequately verified are not approved for outbound calling.

3. Customer restrictions

AXCD's acceptable-use requirements prohibit illegal automated or prerecorded calls, fraudulent impersonation, caller-ID spoofing, and other unlawful traffic. Customers are responsible for applicable consent, do-not-call, and calling-law requirements and must cooperate with compliance investigations. AXCD may restrict or terminate service for violations, subject to applicable obligations.

4. Caller-ID authentication and SkySwitch coordination

AXCD uses SkySwitch as its underlying hosted VoIP platform. AXCD will document in writing which entity authenticates outbound calls under STIR/SHAKEN, the scope of coverage, and the basis for attestation. AXCD will not assert that it has implemented STIR/SHAKEN or is exempt unless that status has been verified. AXCD will limit caller IDs to numbers the customer is authorized to use.

5. Traffic oversight and risk mitigation

AXCD will use available account records, customer complaints, traffic information, and SkySwitch escalation channels to investigate unusual calling patterns, including sudden call-volume spikes, short-duration calling, suspicious destination patterns, and indications of spoofing. Where warranted, AXCD will coordinate with SkySwitch to block, throttle, suspend, or terminate suspect traffic or accounts.

6. Traceback and government requests

AXCD designates compliance@asylumxcd.com and 786-227-0498 for traceback and regulatory inquiries. AXCD's response procedure is to promptly acknowledge requests, preserve relevant evidence, identify the account and available call records, coordinate with SkySwitch, and provide complete responses within applicable deadlines, including the 24-hour traceback response commitment where required. AXCD will establish reliable monitoring and after-hours escalation before certification.

7. Incident management

For credible reports of illegal traffic, AXCD will record the complaint, preserve records, assess risk, coordinate immediate mitigation with SkySwitch, document the investigation and corrective action, and determine whether service should be reinstated or terminated. Public-safety and emergency-calling obligations will be considered in any network restriction.

8. Records and ongoing review

AXCD will maintain reasonable records of customer verification, number authorization, complaints, investigations, traceback responses, provider coordination, and enforcement actions, with access limited to authorized personnel. AXCD will periodically review its program and update the FCC filing as required when material information changes.

9. Certification and implementation confirmation

Before submitting an FCC certification, AXCD's authorized officer will verify that the foregoing procedures are actually implemented, that SkySwitch's technical responsibilities are documented, that the selected role in the call chain is correct, and that the filing accurately describes AXCD's current operations.

Prepared: November 20, 2026 **Status:** DRAFT — NOT YET CERTIFIED