Robocall Mitigation Program

BroadConnex Inc, FRN 0039282611

1604 Philadelphia Pike #198, Wilmington, DE 19809. 302.304.3053. Updated November 20, 2026.

1. Company information

BroadConnex Inc is a Delaware corporation and a non-facilities-based reseller of hosted voice service to business customers. Principal: Robert Snook, President. Affiliates under common control: EKG IT, Inc., which provides managed IT services to BroadConnex Inc customers and bills voice service as BroadConnex Inc's billing agent; and Phalanx Internetworks, Inc., which previously operated the business as Phalanx Internetworks, Inc. dba BroadConnex (FRN 0028611192). Sole upstream provider: PayG LLC dba SkySwitch.

2. Role in the call chain and STIR/SHAKEN status

BroadConnex Inc is a voice service provider without a STIR/SHAKEN implementation obligation, because it is a non-facilities-based reseller that lacks control over the network infrastructure needed to implement STIR/SHAKEN.

- BroadConnex Inc resells hosted PBX and SIP voice service provisioned entirely on the network of its sole upstream provider, PayG LLC dba SkySwitch, which it purchases in its own name.
- BroadConnex Inc does not own or operate switching, SIP signaling, session border controllers, or PSTN interconnection facilities.
- BroadConnex Inc does not hold an SPC token and cannot sign calls. SkySwitch originates all BroadConnex Inc traffic onto the PSTN and authenticates it under SkySwitch's own STIR/SHAKEN implementation, with A attestation for telephone numbers obtained from SkySwitch.
- BroadConnex Inc does not act as a gateway provider and does not carry or transit traffic for other providers.
- BroadConnex Inc serves a small number of business end users, each with fewer than 5 users. It does not offer service to residential consumers, call centers that place outbound marketing calls, or autodialer or voice broadcast platforms.

3. Know your customer

BroadConnex Inc verifies the identity and business of every customer before service starts and before any telephone number is assigned.

- Every customer is a small business with an existing managed IT services relationship with EKG IT, Inc. under a signed Master Agreement. BroadConnex Inc knows each customer's owners and staff directly.
- Voice service is provided only under a signed PulseWatch Telephony as a Service Addendum naming BroadConnex Inc as the voice service provider.

- Before activation, BroadConnex Inc records the customer's legal name, business address, primary contact, and intended use of the service.
- Outbound caller ID is limited to telephone numbers assigned to that customer on the SkySwitch platform or ported in with a signed letter of authorization showing the customer controls the number.
- Concurrent call capacity is sized to the customer's user count. Requests for more capacity, outbound dialing campaigns, or numbers in bulk are reviewed by the principal and declined where the use looks like telemarketing or voice broadcasting without consent.

4. Know your upstream provider

BroadConnex Inc uses one upstream provider, PayG LLC dba SkySwitch, Arborcrest 1, 751 Arbor Way, Suite 150, Blue Bell, PA 19422, 747.777.8100, support@skyswitch.com, and does not accept traffic from any other provider.

- Before relying on an upstream provider, BroadConnex Inc confirms it has an active Robocall Mitigation Database filing and has not been removed from the database.
- BroadConnex Inc rechecks its upstream provider's listing at least once a year, at its own annual recertification.
- BroadConnex Inc keeps its contract with SkySwitch, which binds SkySwitch to comply with FCC robocall rules and to sign calls originating on its network.
- If the upstream provider is removed from the database, BroadConnex Inc will move its service to a compliant provider.

5. Reasonable steps to avoid originating illegal robocalls

- **Network monitoring:** SkySwitch monitors outbound traffic in real time and flags calls with invalid or unallocated calling numbers. Calls with invalid caller ID are not signed.
- **Account review:** BroadConnex Inc reviews customer call detail records monthly for unusual volume, short duration calls, high rates of unanswered calls, and calls to sequential numbers.
- **Investigation:** When monitoring, a complaint, or a traceback request points to a customer, BroadConnex Inc investigates the same business day.
- **Action:** A customer found originating illegal robocalls is suspended immediately and terminated if the conduct is confirmed. Lesser problems get a written warning and closer monitoring.
- **Contract terms:** The PulseWatch Telephony as a Service Addendum prohibits illegal robocalls, caller ID spoofing, and telemarketing without consent, requires cooperation with tracebacks, and allows immediate suspension.

6. Traceback and Enforcement Bureau commitments

BroadConnex Inc commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. It will identify the

customer that originated a traced call, provide the records requested, and cooperate in investigating and stopping any illegal robocaller using its service. Traceback requests are monitored at the contact email below, including weekends and holidays. When notified by the FCC Enforcement Bureau, BroadConnex Inc will block and report the identified illegal traffic, and any substantially similar traffic, on an ongoing basis. If its investigation finds the traffic is not illegal, it will tell the Enforcement Bureau why it reached that conclusion and what steps it took.

7. Robocall mitigation contact and plan review

Robert Snook, President, Broadband Solutions, BroadConnex Inc, 1604 Philadelphia Pike #198, Wilmington, DE 19809, 302.304.3053, robocall.mitigation@broadconnex.com. BroadConnex Inc reviews this program at each annual recertification and updates its filing within 10 business days of any change.