

iGEM dba Globalgig Communications

Robocall Mitigation Plan – February 2026

This robocall mitigation plan is for IGEM DBA GLOBALGIG COMMUNICATIONS, with headquarters at 1870 West Bitters Road San Antonio, TX 78248.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

IGEM DBA GLOBALGIG COMMUNICATIONS has not been prohibited from filing a certification in the Robocall Mitigation Database.

IGEM DBA GLOBALGIG COMMUNICATIONS does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

IGEM DBA GLOBALGIG COMMUNICATIONS uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group.

This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. We use this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

We also validate, when possible, that the entity has a legitimate right to use its asserted calling numbers. We use this information to support the attestation level we assign to calls that we originate for that customer.

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

STIR/SHAKEN

We have registered with the STI-PA using OCN 580J. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.

Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues

To further ensure iGEM dba Globalgig Communications network is not utilized for the origination, termination, or

carrying or processing of unwanted and illegal robocalls, Talkie provides the following

name, title, department, business address, telephone number, and email address of the

individual within Talkie that leads iGEM dba Globalgig Communications team that handles robocall mitigation-related

issues as well as responds to traceback inquiries from the FCC, ITG, and law enforcement agencies:

Contact Name: Corey Mills

Contact Title: Voice Engineering Manager

Contact Department: Voice Engineering

Contact Street Address: 1870 West Bitters Road

Contact City: San Antonio

Contact State and Zip Code: Texas 78248

Contact Telephone Number: (872) 278-0795

Contact Email: voiceengineering@globalgig.com

Consistent with FCC Regulations, 47 C.F.R. § 64.6305(d)(5), Talkie will update its submission in the RMD within 10 business days of any change to the applicable information it must provide and update in the RMD.

9 This is 24-hour window applies within business days, per rule 47 C.F.R.