

To whom this may concern:

INFINIVIRT TECHNOLOGIES S.A.S., located at Cra 43a #9 Sur-91, South Tower in Medellin, Colombia, takes preventing Robocalling seriously and has implemented several measures to prevent robocalls from completing to the global PSTN by implementing volume-based call limiting, short-duration call monitoring, Calling Party validation, and E.164 number rejection to prevent robocalls from reaching the PSTN, with accounts flagged or blocked if suspicious activity is detected and customers required to provide documentation supporting their calls.

Volume-based Call Limiting – Customer accounts generating call volumes exceeding representative thresholds (e.g., approximately 1,000 calls per hour) are flagged for review. Thresholds are applied on a per-customer basis and evaluated relative to historical traffic baselines and the customer's declared use case. Flagged traffic is manually reviewed for indicators of suspicious or non-compliant activity. If the traffic is deemed illegitimate or inconsistent with the declared traffic profile, the customer is contacted to request clarification. Failure to respond or to provide satisfactory justification may result in traffic throttling or service suspension.

ACD-based Call Limiting – customers generating sustained short-duration calls (>15 seconds) are flagged and the account is manually reviewed for suspicious activity. If "Average Call Duration (ACD / ALOC metrics)" fails to improve the account is automatically placed into a "penalty box". If ALOC fails to improve over the medium term the account is manually blocked, and a formal communication is sent to the customer.

Calling Party validation - customers are required to provide documentation supporting ownership where NANPA-based numbering resources are used as Calling Party ID on outbound calls.

E.164 rejection – calls with CPID that do not conform to E.164 standards are not permitted on our network.

Do Not Call (DNC)-Related Complaint Handling and Investigation – INFINIVIRT TECHNOLOGIES S.A.S. does not originate consumer calling campaigns and does not directly engage in telemarketing activity. As a wholesale SIP trunking provider, INFINIVIRT does not perform proactive Do Not Call Registry scrubbing on behalf of end users.

Infinivirt maintains procedures to receive, log, and investigate DNC-related complaints or regulatory inquiries when such information is received from downstream carriers, enterprise customers, regulatory authorities, or traceback organizations.

Upon receipt of a DNC-related complaint or notice indicating potential illegal robocall activity:



The associated customer account and traffic profile are reviewed.

Call detail records (CDRs), call volumes, call duration metrics, and calling party identification data are analyzed to identify abnormal or non-compliant calling behavior.

If traffic patterns are determined to be suspicious or inconsistent with the customer's declared use case, mitigation actions are taken, which may include traffic throttling, temporary suspension, or service termination.

INFINIVIRT cooperates fully with lawful requests for information, call tracing, or traceback activities conducted by the FCC, law enforcement agencies, or authorized industry traceback groups. Identified violations may result in immediate suspension of service pending investigation.

Our NOC is available 24/7 365 days a year to support robocall mitigation and traceback requests.

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