

Plintron Technologies USA LLC

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Plintron Technologies USA LLC (“Plintron”) to mitigate and eliminate illegal robocalling. Plintron has an ongoing commitment to help alleviate illegal robocalling by working with other providers and regulatory agencies in combatting fraudulent voice activity.

Plintron is a non-Gateway Intermediate Provider who provides wholesale-only Mobile Virtual Network Operator (“MVNO”) calling services. All telecom services are provided on a resale-only basis. As a telecom reseller, Plintron is dependent on our upstream provider’s assistance with monitoring their networks for fraudulent voice calling patterns.

Know Your Underlying/Upstream Provider

Plintron Technologies USA LLC has master service agreements with our upstream providers and has received from their officials that it has and will continue to sign calls submitted to Plintron Technologies USA LLC and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Plintron. Plintron and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. Plintron also vets through commercial contractual agreements.

In our research of the prospect, Plintron will not activate clients that provide anonymous information or where data mismatches are found. Additionally, if our MVNO prospects or their end customers are involved in any fraudulent or illegal activity using the service or facilities offered, we are obliged to deny the service for that partner or their end user.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Plintron as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Plintron is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Plintron will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Neeraj Vats
Technical Director
+1425-647-4212

Upon calling our dedicated Traceback Department, an initial ticket is opened with Network Operations. This request is then routed to our upstream provider and Management is notified.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. Actions vary on a case-by-case basis.

Telephone Numbers

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. As we are an intermediate provider, we do not interact with end customers but our MVNO/partners do.

International Calling

Plintron is not currently an international voice services provider. If at any time Plintron does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our upstream provider to perform the necessary telephone number validation on all international originated calls.

Please note that Plintron Technologies USA LLC (Plintron/PA) is a registered USA entity and a domestic intermediate provider, however the Parent company is Plintron Western Holdings Limited, a body corporate having its registered office in Ireland.

Call Analytics

As a reseller, Plintron must rely on our upstream provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

Plintron's upstream providers monitor and examine to detect suspicious call activity and/or calling patterns. When we and/or our upstream provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action.

Plintron Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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