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WorldNet Telecommunications LLC (WorldNet) is a small voice service provider that has fully implemented STIR/SHAKEN on the IP portions of its network. WorldNet also has portions of its network that rely on technology that cannot initiate, maintain, and terminate SIP calls. These portions of its networks are deemed subject to a continuing extension pursuant to 64.6304(d). All calls on WorldNet’s network are subject to this robocall mitigation plan, which details the reasonable steps WorldNet takes to avoid originating, carrying, or processing illegal robocall traffic on its network.

WorldNet takes reasonable steps to ensure that new and renewing customers do not use its network to originate illegal robocalls. As a small voice service provider focused on the enterprise market in Puerto Rico, WorldNet vets the identity of its retail and wholesale subscribers through its interactions with those customers when entering into service agreements and provisioning service. WorldNet collects the following type of information from its customers: company name, contact information, physical address, tax ID number. It also enters into a service contract with those customers. WorldNet further combats the origination of illegal robocalls through the attached Robocall and Fraud Events Process.

WorldNet has a small percentage of traffic for which it acts as a gateway provider. WorldNet takes reasonable and effective steps to ensure that any foreign originating provider or foreign intermediate provider from which it directly receives traffic is not using WorldNet to carry or process a high volume of illegal traffic. Among other things, WorldNet takes steps to “know-it-upstream providers.” WorldNet has a limited number of vetted foreign upstream providers for which WorldNet serves as a gateway provider and has contracts in place that allow WorldNet to terminate traffic where issues arise. WorldNet monitors all incoming traffic, including traffic from foreign upstream providers, for issues on an ongoing, proactive basis. WorldNet collects the following type of information from its upstream providers: company name, contact information, physical address, tax ID number.

As detailed extensively below, WorldNet has a robust robocall and fraud management process. For these analytics, WorldNet utilizes a Fraud Management system called [REDACTED]. It has also implemented a solution called [REDACTED], for end-to-end network monitoring, troubleshooting and anomaly detection.

WorldNet commits to respond fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

[[Begin Redaction]]

[[End Redaction]]