

LD TELECOMMUNICATIONS, INC.

ROBOCALL MITIGATION PLAN V2.32

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Introduction

LD Telecommunications, Inc. is committed to actively combating illegal robocalls by implementing effective mitigation measures designed to prevent, detect, and stop the origination, carrying, or processing of such calls. As a wholesale carrier primarily engaged in the reselling of international and U.S. domestic termination services to both foreign and domestic carriers, LD Telecommunications recognizes its critical role in minimizing the impact of robocalls within the telecommunications ecosystem. This plan outlines specific measures that LD Telecommunications will take to reduce illegal robocalls, respond promptly to traceback requests, and cooperate fully with law enforcement and regulatory authorities in addressing illegal robocalling activity.

Role in the Call Chain

LD Telecommunications, Inc. operates as a **wholesale carrier** and resells both international and U.S. domestic termination services to various foreign and domestic carriers. As such, LD Telecommunications does not directly serve consumers, but rather facilitates the transmission of voice traffic between other telecommunications providers, which includes:

- **Wholesale Termination Services:** Providing termination of international and domestic calls to downstream carriers.
- **Call Carrying/Transport:** Acting as a transit or intermediary carrier, LD Telecommunications transports calls between other telecommunications carriers.

LD Telecommunications is not directly connected to end users (consumers), it does not originate calls or directly interact with consumers; however, it plays a crucial role in carrying or terminating calls that may involve both legal and illegal robocalling activity.

Robocall Mitigation Practices

LD Telecommunications, Inc. is committed to ensuring that its services are not used to facilitate or propagate illegal robocalls. To achieve this, the company has implemented a set of best practices and mitigation strategies:

1. STIR/SHAKEN Implementation

LD Telecommunications has begun implementing the STIR/SHAKEN (Secure Telephone Identity Revisited / Signature-based Handling of Asserted Information Using Tokens) framework to authenticate and validate caller ID information across its network. As a wholesale carrier, LD Telecommunications plays a key role in ensuring that the calls it carries and terminates adhere to these standards to prevent illegal spoofing and robocalling.

LD Telecommunications has initiated the integration of STIR/SHAKEN standards for all domestic calls and has completed the full deployment for all voice traffic.

Due to limitations in international interconnection agreements, LD Telecommunications is working with foreign carriers to implement STIR/SHAKEN for international calls as part of ongoing network improvements. However, in most cases, these interconnections may not yet fully support STIR/SHAKEN signaling, which may require additional time to deploy.

LD Telecommunications will apply for a temporary extension of its full STIR/SHAKEN implementation for international calls and transit traffic, where international interconnection agreements that have not yet been fully updated to support STIR/SHAKEN. This request will be submitted to the FCC for review and approval, outlining the technical limitations and efforts to complete full deployment.

2. Call Blocking and Filtering

LD Telecommunications employs automated call blocking and filtering tools to detect and block calls from high-risk sources, including calls identified as originating from known spoofed numbers, robocall sources, or other fraudulent entities.

These filters are regularly updated to reflect the latest known bad actor lists and industry reports. Any patterns of unusual calling volumes or suspicious destinations will trigger an automatic review and potential blocking of traffic. Among these are:

- If a trunk received more than 100 calls from the same ANI, our Network Operation Center will evaluate various parameters such as ASR, ACD and Short Duration Percentage to determine if any of these parameters are below a pre-set threshold and block the ANI.
- If additional calls are received from similar ANI's, same NPA-NXX the above referenced procedure will be done and ANIs blocked.
- If LD Telecom finds suspicious traffic, i.e. large volume of short duration calls, it will increase the level of scrutiny of the calls originating from such customer and take the following additional steps:
 - Block any call in the DNC list
 - Block any call with a US Wireless DNIS
 - Block inbound media IPs that are known to produce fraudulent calls

3. Customer Screening and Enforcement

LD Telecommunications has strict customer due diligence policies in place to screen customers before they are allowed to use its wholesale termination services.

The company conducts background checks and verifies the business activities of customers to ensure that they are not engaged in illegal robocalling or spoofing activities. Any customer found to be using LD Telecommunications' services for illegal purposes,

including the origination or carriage of robocalls, will have their services immediately suspended or terminated.

4. Regular Audits and Compliance Monitoring

LD Telecommunications conducts regular audits of traffic patterns, customer behavior, and call data to identify any unusual or potentially abusive activities. This includes reviewing high-volume calling patterns, especially from newly onboarded customers.

The company will maintain compliance logs and records of traffic for a minimum of three months to ensure full traceability and accountability for all calls processed.

Traceback Cooperation and Response

LD Telecommunications, Inc. understands the importance of traceback efforts in identifying the origins of illegal robocalls. The company is committed to the following:

- **Responding to Traceback Requests:** LD Telecommunications commits to responding fully to any traceback requests from the FCC, law enforcement, and the industry traceback consortium within 24 hours of receiving the request.
- **Cooperation with Investigations:** LD Telecommunications will fully cooperate with regulatory authorities, including providing all relevant traffic data and call records necessary to assist in investigations aimed at identifying and stopping illegal robocall operations.

In the event that LD Telecommunications identifies or is informed of illegal robocalls involving its network, the company will take immediate steps to trace the call origin, suspend or terminate services to the involved customer(s), and work with authorities to stop further illegal activity.

Legal and Regulatory Compliance

LD Telecommunications, Inc. is not currently subject to any Commission, law enforcement, or regulatory agency actions or investigations related to suspected unlawful robocalling or spoofing.

The company has a robust internal monitoring and compliance program designed to prevent the misuse of its services for illegal robocalling.

LD Telecommunications, Inc. has not been identified as a significant contributor to illegal robocalling activities in any reports from the FCC, law enforcement, or other regulatory bodies.

In the event that the company is made aware of any such activity or investigation, it will cooperate fully with the authorities and take swift corrective action to ensure compliance with all relevant regulations.

In summary, LD Telecommunications, Inc. is fully committed to mitigating the impact of illegal robocalls by implementing robust and comprehensive mitigation measures. These practices, including STIR/SHAKEN authentication, automated call blocking, and customer screening, will significantly reduce the risk of illegal robocalls originating from or carried through the company's network. Additionally, LD Telecommunications is committed to responding promptly to traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to fully cooperating in the investigation and cessation of illegal robocall activity.

This Robocall Mitigation Plan will be regularly reviewed and updated to ensure that LD Telecommunications continues to meet or exceed industry standards and regulatory requirements in the ongoing fight against illegal robocalls.