

Elige Communications Limited (Elige Africa) is a telecom operator licensed in Kenya. It has organic retail traffic of its own customers, including outbound traffic to destinations within the United States.

To mitigate unsolicited calls, including robocalls, Elige Africa applies measures intended to detect suspicious traffic patterns and block applicable traffic, including both automatic monitoring using fraud systems and manual procedures.

The following is a brief description of the measures employed:

a. Automatic Approach

Elige Africa has implemented a monitoring tool used to monitor, in real time, outbound voice traffic patterns. This tool relies on the following rules and benchmarks:

- i. **Low ASR (Answer Seizure Ratio):** Specific originating number to +1 destination that dials more than 999 calls in 1 hour, checked every 15 minutes, regardless of the call's duration.
- ii. **High call duration hourly:** Specific originating number to +1 destination that creates more than 499 duration of minutes in 1-hour time units.
- iii. **High call duration daily:** Every +1 origin number that creates more than 999 duration of minutes in 24 hours.

An originating number that falls into any of the above categories raises an immediate alert and is promptly reviewed. If the review reveals that the traffic is of an abusive nature, any further outgoing traffic on Elige Africa's network from the applicable originating number will be blocked. The maximum time for blocking is up to 24 hours, although in most cases numbers are blocked within 1 hour from the moment the alert is raised.

b. Manual Approach

Elige Africa actively checks +1 destinations voice traffic according to the following procedures:

- i. Elige Africa manually monitors network statistics, in search of anomalies that may indicate fraud, robo-dialing, or other forms of abuse.

In addition to the above, Elige Africa certifies that it will commit to respond to all traceback requests from the Commission or law enforcement agencies and will cooperate with best efforts with such entities in investigating and stopping any illegal robocalls that use its service to originate calls.


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