

Robocall Mitigation Plan

SETAR N.V. and T.A. Resources N.V. (“TA Resources”, together with SETAR N.V., “SETAR”) have adopted this robocall mitigation plan to take measures to limit the potential for the origination of unlawful robocalls from their network and in accordance with 47 C.F.R. § 64.6305. SETAR will update this plan within ten (10) business days following the date of any changes.

SETAR’s Role in the Call Chain

SETAR N.V. is a licensed telecommunications operator that provides voice services to end users in Aruba. SETAR N.V.’s customers are able to use its voice services to place calls destined for end users located in the United States (and other countries).

TA Resources is a cable operator serving end users in Aruba. Although TA Resources maintains equipment located in the United States, TA Resources does not provide any voice services to customers in Aruba or in the United States. The extent TA Resources begins providing voice services, the terms of this plan will apply.

STIR/SHAKEN Implementation Obligation and Status

SETAR N.V. is a foreign voice service provider that does not have a STIR/SHAKEN implementation obligation. All traffic originated by SETAR N.V. is originated using Aruba-based facilities. Moreover, all telephone numbers assigned by SETAR N.V. to its customers, and used in the caller ID field for U.S.-bound voice traffic, are allocated pursuant to the national numbering plan promulgated by the Directorate of Telecommunication Affairs in Aruba. As a foreign voice service provider that only uses Aruban telephone numbers, SETAR N.V. is exempt from an implementation obligation because it is unable to obtain a Service Provider Code token.¹

TA Resources does not provide any voice services to customers in Aruba or in the United States as a voice service provider, a Non-Gateway Intermediate Provider, or a Gateway Provider. Therefore, TA Resources does not have a STIR/SHAKEN implementation obligation.

Robocall Mitigation Measures

There are a variety of mitigation techniques that SETAR uses to mitigate or entirely prevent the transmission of illegal robocall traffic. An overview of these approaches is discussed below.

- a) SETAR commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and will cooperate (to the extent permitted by applicable local law) with such entities to investigate and stop any illegal robocallers found to use its service to originate calls.
- b) SETAR’s contracting process requires that all contracts be signed by authorized representatives of the customer. Before initiating service to any new post-paid customer, SETAR collects contact information to confirm the identity of the customer including name, valid identification (*e.g.*, passport, driver’s license or other ID card), billing address, and service address. For business customers, SETAR also collects a recent extract from the register of the Chamber of Commerce and, if applicable, a power of attorney or authorization letter authorizing the signatory to sign the service agreement on behalf of the customer. SETAR’s General Terms and Conditions also require customers to provide (upon request by

¹ See 47 CFR Section 64.6304(b).

SETAR) proper identification and other information necessary to assess an application for services and allow for SETAR to check the creditworthiness of the customer. SETAR's General Terms and Conditions also permit SETAR to refuse to provide services if the customer (among other things) does not provide information requested for the contracting process.

- c) For all new and renegotiated contracts governing voice services, SETAR incorporates language to which the customer acknowledges it will not use the service to originate illegal robocalls. The General Terms and Conditions limit the use of SETAR's services for normal, reasonable, and personal use in the home (for residential customers) or normal business use (for corporate customers). SETAR also maintains a Fair Use Policy that further outlines the company's policy for reasonable use of the services. SETAR retains the right to terminate (or temporarily deactivate) the services for customers identified as using the services to originate illegal robocalls or in another manner that violates the Terms and Conditions.
- d) Call Detail Records (CDRs) are created for all calls and stored in a searchable database. Each CDR includes information such as timestamp, ANI, DNIS, and originating IP addresses. This information is stored for a maximum of 6 months.
- e) All calls are continuously screened by SETAR's in-house fraud control solution (SIMA). Calls having suspicious calling patterns are investigated. SETAR may opt to block traffic proactively based on the result of said investigation. SETAR notifies the sending party/customer of such action. Currently, SETAR does not use any call analytics systems provided by third-party vendors for purposes of identifying and/or blocking suspected robocalls.
- f) SETAR's U.S.-bound traffic enters the U.S. through intermediate carriers which are listed on the FCC's Robocall Mitigation Database.
- g) SETAR takes steps to conduct due diligence to vet upstream providers from which SETAR receives voice traffic. SETAR maintains agreements with the providers from which it receives voice traffic which remain subject to review and revision from time to time in order to comply with applicable regulatory requirements.

Ownership and Management

TA Resources is directly, wholly-owned by SETAR N.V., which in turn is wholly-owned and controlled by the Government of Aruba. TA Resources has held international section 214 authorization (*see* OIA File No. ITC-214-20100107-00010) since 2011 and is compliant with the FCC's requirements regarding disclosure of its reportable interest holders. The principals, directors, and key management of SETAR are:

Name	Title
Zenovio Roland Croes	Director/CEO
Carlos Tapias	CFO
Alvin Albert Boekhoudt	Legal Counsel
Raul Rodolfo Jose Ponson	CTO
Ronica Maria Lopez	CCO
Sonia Astrid Damian	Manager Human Resources
Stephen Gregory Daal	President of Board of Supervision
Anthony Giovanni Croes	Vice President of Board of Supervision
Giovanni Jose Atencio	Member of Board of Supervision

Iveta van Veen	Member of Board of Supervision
Diana Carolina Lopez Paz	Member of Board of Supervision

Additional information regarding SETAR is available at: <https://www.setar.aw/>.