

Telecom Argentina USA, Inc.
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telecom | personal | flow

April 23rd, 2024

Ref: Robocall Mitigation

To whom it may concern,

Telecom Argentina USA, Inc., on behalf of itself and its affiliate Telecom Argentina S.A. (collectively and individually referred to as 'TA'), hereby submits an updated certification required to comply with additional content requirements adopted by the Federal Communications Commission in March 2023. (See Id.; 47 CFR § 64.6305.)

TA confirms that any prior certification has not been revoked by Commission action and that it has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

TA also confirms that at no time in the past two years has it been the subject of formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to TA transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or due to a deficient Robocall Mitigation Database certification or mitigation program description.

TA is unable to implement STIR/SHAKEN due to a lack of control over the network infrastructure necessary for its implementation.

TA has undertaken the following measures to mitigate robocalls on its network:

a. **Know your customer:**

TA has implemented processes to stop illegal calls before they are placed. TA will confirm the identity of new or renewing wholesale customers by collecting information such as the following: a) physical business location; b) a contact person for the business; c) national registration tax ID number; d) nature of the customer's business; e) background and financial checks; and, in addition, a stringent process for careful selection of customers with a good reputation in the industry.

Furthermore, TA maintains interconnection agreements with wholesale customers outlining the acceptable uses of the service and prohibits, among other things: 1) modification of network information for deceptive purposes; 2) violation of local, state, or federal laws; and 3) use of TA's network to engage in fraudulent activity. TA reserves the right to suspend or terminate any business relationship for violating the service terms.

b. Robocall Mitigation Program

TA is implementing a robocall mitigation program described below, requiring all voice traffic that originates on our network to be subject to these stringent standards. Telecom Argentina monitors network traffic to assure service quality 24/7. TA's Fraud Prevention Department monitors outbound traffic to identify suspicious high-volume traffic and patterns. TA limits how many calls per second a customer can make to prevent burst traffic patterns. When suspicious traffic is flagged, TA acts promptly to mitigate this activity.

- 1) Blocking or rejecting known fraudulent/abusive traffic or invalid calling numbers.
- 2) Blacklisting a known abusive number.
- 3) Tracing the call traffic back to the originating party.
- 4) Reporting instances of irregular traffic activity to our carrier customers.
- 5) Requiring the customer to remediate and provide the cause of found irregular traffic.
- 6) Taking action, such as suspension or termination, for violations.

c. Point of Contact.

Pursuant to 47 CFR 64.6305(B)(4), the Company has designated a point of contact to receive notice of any incidents of illegal robocall traffic. This Point of Contact is named in the Robocall Mitigation Database.

In addition, TA confirms that it will respond within twenty-four (24) hours to all traceback requests from the Commission, law enforcement, and providers, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to send fraudulent traffic.

As required, TA confirms that it will submit any necessary updates due to changes in TA's certification, identification information, or contact information to the Commission within 10 business days of the change.

TA's Fraud Prevention and Network teams are constantly working on improving the tools that can help prevent and detect any kind of fraudulent traffic, and TA management will implement such measures and procedures without undue delay.

A handwritten signature in blue ink, appearing to read 'AS', is positioned above the printed name.

Alejandro Silvestre
Officer
Telecom Argentina USA, Inc.