

DATE	ON BEHALF OF	CHANGE SUMMARY
28 February 2022	MagtiCom LLC ("Company")	Initial Version

Objective

OBJECTIVE	Establishment and enforcement of Policy aimed at securing network security and stability and minimizing potential origination of illegal robocalls
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1. Overview

Apart from general provisions on network security and stability Georgian legislation on electronic communication neither stipulate specific provisions for minimizing robocall mitigation nor implementation of the STIR/SHAKEN caller ID authentication framework is obligatory. Company has several effective call termination agreements with US based electronic service providers and has a willingness to maintain long-lasting and stable relationships with these providers to meet the needs of its consumers intending to make international calls in US.

Regardless of the fact the Company does not actually have yet a STIR/SHAKEN caller ID authentication framework the Company's approach is to evaluate vulnerability of its network and as well as possible threats and eventually establish such framework into its network.

We are aware that US Federal Communications Commission requires that all Domestic providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

FCC requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

It is noteworthy that cases of occurrence of illegal Robocalls in our network are practically none or of minimal quantity and in any such cases Company takes all appropriate technically approved measures to minimize and eliminate transit of such calls.