

ROBOCALL MITIGATION PLAN

Company: PHOENIX SOLUTIONS SL

FCC Register Number (FRN): 0031047442

EU Company Number: ESB92954536

Location: SPAIN – Camino de las Canadas 1D – Office 4- 29649 Mijas – Malaga

Type of Provider: NON-GATEWAY INTERMEDIATE PROVIDER

These are the specific reasonable steps that Phoenix Solutions SL has taken to avoid the carrying or processing of illegal robocall traffic:

- **CallerID Verification:** We enforce strict CallerID policies to prevent spoofing and ensure traceability of outbound calls.
- **Real-Time Monitoring:** Our systems automatically detect anomalies in call patterns, triggering alerts for immediate action.
- **Loop Call Prevention:** Proactive measures are in place to prevent issues like loop calls and overloaded channels.
- **Prepaid Balance Management:** Outgoing calls are suspended when prepaid balances run out, mitigating illegal robocall risks.

Additionally, upon receipt of a complaint from any of our upstream carriers, we promptly initiate an investigation and temporarily block the implicated end user. Following a thorough investigation, if it is determined that our customer is indeed responsible for fraudulent calls, decisive actions are taken, including account closure and cancellation of services. Such measures reinforce our commitment to regulatory compliance and uphold the integrity of our network, while also sending a clear message that fraudulent activities will not be tolerated.

In addition, we describe as requested the following points to enforce our arguments on complying with the program in rules:

- 1- **Non-gateway intermediate providers and voice service providers must describe any “know-your-upstream provider” procedures in place designed to mitigate illegal robocalls**
We rigorously verify their registration status with the FCC database. Additionally, we conduct thorough due diligence to ensure that they are registered and trusted entities within the telecommunications industry. This process involves scrutinizing their business credentials, compliance history, and adherence to regulatory standards. By undertaking these measures, we aim to maintain a network ecosystem that prioritizes lawful and responsible telecommunications practices while safeguarding against illegal robocalls.

2- All providers must describe any call analytics systems they use to identify and block illegal traffic including, whether they use a third-party vendor or vendors and the name of the vendor(s)

We have a strict policy that requires all external numbers used as CallerID to be provided by our telecom company or have proof of ownership. This policy is in place to prevent spoofing and ensure accountability for all outbound call traffic. Additionally, we have monitoring systems to prevent loop calls or overloaded channels. Whenever our system detects any anomalies, we receive email warnings to take necessary actions. Also, as a prepaid company, our customers' calls will stop as soon as they run out of credit to prevent huge invoices.

3- To comply with the new requirements to describe their “new and renewing customer” and “know-your-upstream provider” procedures, providers must describe any contractual provisions with end-users or upstream providers designed to mitigate illegal robocalls

Our agreements with end-users include provisions that explicitly prohibit the use of our services for unlawful purposes, including the transmission of illegal robocalls. Additionally, we require end-users to adhere to all relevant regulatory guidelines and cooperate with any investigations related to call misuse. With upstream providers, we enforce contractual obligations that mandate compliance with FCC regulations and industry best practices for robocall mitigation.

CONTACT

Please direct questions related to Robocall Mitigation issues to:

Daniel Kauffer

IT Infrastructure Manager

danny.kauffer@megacall.es

+34952667511