

Colt Robocall Mitigation Program



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Executive summary

Headquartered in London (England), Colt Technology Services ("Colt") is a multinational fixed telecommunication operator that provides both data and voice services for business customers in more than 35 countries across the world.

Colt is committed worldwide to fight fraudulent voice traffic, especially from illegal robocalls. As part of Colt's submission to the Robocall Mitigation Database, this document describes :

- Colt's commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocalls;
- Colt's policies to screen new customers;
- Colt's enforced contractual terms which aim to prevent the use of Colt's services for any fraudulent or unlawful purposes;
- Colt's technical controls to detect and block fraudulent traffic, including illegal robocalls; and
- Colt's industry-level efforts to fight fraud and illegal calls, including robocalls.

Collaboration with the Commission, the ITG and authorities

Colt is committed to responding fully and in a timely manner to all traceback requests from the Commission, civil and criminal law enforcement, and the Industry Traceback Group. Colt is committed as well to cooperate with such entities in their investigation and will provide the required help to stop illegal robocallers from using its service in a fraudulent manner. Colt's anti-fraud team will coordinate Colt's response to traceback requests from the Commission, civil and criminal law enforcement, and the ITG.

Colt is committed to take steps to effectively mitigate illegal traffic when it receives a written notice of such traffic from the Commission. Colt will promptly report the results of its investigation to the Enforcement Bureau, including steps taken to effectively mitigate the identified traffic if it proves to be fraudulent or illegal.

Screening new customers

Colt has established and implemented comprehensive policies to know its customers before providing any service, as well as its providers (including any upstream provider). Such measures are constantly reviewed and improved to prevent a situation in which Colt's services are being used to generate any illegal or fraudulent traffic. When onboarding a new customer, to the best of its abilities, Colt diligently considers public notices and official communications from regulatory authorities and law enforcement agencies that concern the potential customer.

General terms and conditions

Colt's contractual terms allow it to enforce actions against customers or upstream providers that generate illegal or fraudulent traffic. Colt's current general terms and conditions prohibit the use of Colt's services for any fraudulent or unlawful purposes. If Colt reasonably suspects that any of its services is being used for fraudulent or unlawful purposes, Colt reserves the right to suspend or terminate such service. Colt does not and will not hesitate to enforce such contractual terms.

Controls on voice traffic

Colt has its own fraud management system to automatically detect voice frauds via Call Detail Records (CDRs) analysis. It also relies on ROC FM , a call analytic tool provided by Subex. Fraud detection is based on specific rules (geographic rules, traffic patterns, ratio/proportion rules, host list based rules, etc.), thresholds and parameters (including calling number, destination, duration and timestamp).

The Voice Anti-Fraud Operational team takes all the necessary measures to block fraudulent traffic including illegitimate robocalls, spams calls and calls with spoofed CLI. Colt is permanently investing to improve its fraud-detection capabilities and the time to react to be near real time. Furthermore, Colt is proactively collaborating on a regular basis with other service providers and interconnection partners across the globe to detect and block fraudulent traffic.

Regarding more specifically the US, wholesale customers cannot originate calls with American CLIs unless they are registered with the Robocall mitigation database. Compliance of US traffic is monitored by Colt's anti-fraud team.

Colt's initiatives to fight fraud and illegal calls

Colt is committed to fight fraudulent and illegal voice traffic, especially from robocalls. Colt takes an active role worldwide to define and follow the best approaches and guidelines to fight against fraud in general and robocalls in particular. Colt is a member of the Global Leader Forum and has signed the Code of Conduct to fight against voice frauds in 2018. Colt has been certified compliant with the GLF Code of Conduct in October 2025.

Colt has also implemented the main tools, processes, resources and contractual terms to meet its commitments to fight against fraud. Colt is also the i3 Forum.

Colt is also compliant with Section 64.1200(o) of the Commission's rules, which require voice service provider to block any calls purporting to originate from a number on a reasonable do-not-originate list. As a reseller of voice services in the United States, Colt maintains these capabilities through its wholesale voice service provider.