

France Telecom Long Distance L.L.C. d/b/a Orange Carriers USA ("Orange Carriers") is an intermediate provider which receives foreign originating U.S. terminating traffic directly from foreign carriers. As such, it falls under the definition of gateway provider contained in 47 C.F.R. § 64.6300.

Orange Carriers mainly provides telecommunications services on a wholesale basis to other U.S. and foreign carriers.

Orange Carriers has adopted the third party's solution by TransUnion, f/k/a Neustar, in order to implement Stir/Shaken. Orange Carriers has fully implemented the Stir/Shaken authentication methodology for all traffic.

Orange Carriers complies with all currently applicable Robocall Mitigation regulations.

Orange Carriers takes reasonable steps to avoid carrying or processing illegal robocall traffic. Orange Carriers assigns a sales representative to each carrier customer. Such representative is tasked with becoming familiar with the customer and the customer's traffic. If a question related to the validity of the customer's traffic is raised, the sales representative contacts the carrier customer directly and asks the customer to initiate blocking of all calls which are deemed illegal robocalls.

Orange Carriers employs a variety of "know-your-customer" initiatives to help mitigate the risk that its customers would attempt to use Orange Carriers' network to carry illegal robocalls. Orange Carriers serves primarily wholesale carrier customers and has a rigorous process of vetting its customers, including but not limited to checking its customers legal identity, credit and financial worthiness, and thereafter requiring them to maintain appropriate prevention, detection and remedial measures to ensure they are not subject to Economic Sanctions. Orange Carriers only provides service to carriers which are listed in the FCC's RMD.

Our contractual provisions with carrier customers who are upstream providers prohibit them from using our network in any manner that would be potentially unlawful or damaging. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, it is our policy to invoke our rights under our agreements with upstream providers to suspend and/or terminate service.

Our customer agreements include additional language that is designed to prevent any unlawful or fraudulent use of our services. Orange Carriers supports industry standard CLI presentation and restrictions. Orange Carriers also prohibits the use of certain CLI/ANI in accordance with applicable law or regulation, and Orange Carriers may stop all voice traffic (whether incoming or outgoing) associated with any CLI/ANI that is restricted.

If Orange Carriers discovers or reasonably believes that fraudulent calls are being made, then Orange Carriers takes immediate action that is reasonably necessary to prevent such fraudulent calls from being made, including denying services to certain carrier customers.

Orange Carriers is committed to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.