

Orange S.A. – Robocall Mitigation Efforts

This document describes (1) Orange S.A. (“OSA”) and its operations around the world, (2) the specific reasonable steps OSA has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program, and (3) its commitment to respond fully and in a timely manner to all lawful traceback requests.

(1) Presentation of OSA

OSA is a France-based multi-service worldwide telecommunications operator which provides fixed, mobile, fiber and broadband Internet services to consumers, companies and carriers.¹ OSA meets the FCC’s definition of “foreign carrier” under 47 C.F.R. § 64.6300(c).²

OSA is a recognized player in anti-fraud & security services and has won numerous awards for its efforts, including:

ITW Global Leaders’ Forum (“GLF”) 2025 Excellent Attestation rank

Global Data Analysis 2021: Leader in Anti-fraud & Security assessment

Global Carrier Award 2019: Winner best anti-fraud innovation

Global Awards 2019: Best security solution provider

Global Carrier Award 2018: Winner best anti-fraud innovation

OSA is actively engaged in the protection of operators’ voice traffic through various proprietary solutions. The list of voice frauds OSA actively fights against are: By-pass, IRSF & Hi-jacking, PBX hacking, Ping/Wangiri, and Spam.

OSA’s solutions operate on a 24/7 basis and detections are analyzed by a team of fraud analysts who proceed to the filtering of incriminated numbers and ranges also on a 24/7 basis. For the case of spam particularly (but not specifically), OSA relies on a recent in-house solution called [REDACTED] (see (2) below).

OSA requires customers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying its own customer if the call originated in the customer’s network.

¹ OSA is filing on behalf of itself and its divisions such as Orange Wholesale International. Orange Wholesale International is OSA’s division dedicated to serving international wholesale customers worldwide.

² OSA does not recognize FCC jurisdiction over foreign originating traffic which does not use US assigned North American Numbering Plan numbers for robocall mitigation purposes. Further, because OSA does not operate in the United States, it reserves the right to object to any US government assertion of jurisdiction over OSA operations outside of the U.S.

(2) OSA Response to the FCC Requirements

[REDACTED] to monitor all calls going through OSA's international network with a destination set to the USA with a Caller ID that belongs to the North American Numbering Plan number assigned to the U.S.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

This spam detection model is in service since October 2020 to protect French customers from robocalls. Thanks to this, OSA is able to detect any suspected robocall traffic, analyze it and launch further actions among which informing the related customer of such traffic and/or blocking it.

The monitoring will be done by the tool on a 24/7 basis and reports will be generated of suspected robocall traffic from US numbers. Reports will be analyzed by fraud analysts on a regular basis and adjusted as needed based on the volume of suspicious traffic. Alerts will be sent by the fraud analysts to the customer relations managers for follow-up inquiry regarding the origin of the suspicious traffic. Carrier relations managers will contact the identified carrier asking to immediately block the suspicious stream of traffic unless it can be demonstrated to be legitimate. If carrier fails to stop the traffic or give any feedback on the nature of the traffic stream, OSA may take any legally permissible action against the carrier, including blocking.

(3) Answer to Traceback Requests

OSA confirms that it will cooperatively participate with the industry traceback consortium and respond to all lawful traceback requests it may receive from the FCC, 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 originate calls coming from US assigned North American Numbering Plan numbers, as long as it is consistent with applicable French or other foreign laws/regulations.