

## **T-Mobile Robocall Mitigation Plan**

T-Mobile USA, Inc. (“T-Mobile”) submits this Robocall Mitigation Plan pursuant to 47 CFR § 64.6305. T-Mobile plays different roles in call chains, and consistent with the direction provided by the Wireline Competition Bureau submits a single mitigation plan that meets the requirements of 47 CFR § 64.6305(d) (Voice Service Provider), (e) (Gateway Service Provider), and (f) (Non-Gateway Intermediate Service Provider).<sup>1</sup> T-Mobile’s Robocall Mitigation Plan applies to voice traffic originated over its network, including traffic associated with the below subsidiaries that are voice service providers, for which T-Mobile retains control over numbering resources, call origination, STIR/SHAKEN implementation, and robocall mitigation compliance.

| <b>Name</b>                       | <b>FCC Registration Number (FRN)</b> | <b>Operating Company Number (OCN)</b> |
|-----------------------------------|--------------------------------------|---------------------------------------|
| MetroPCS California, LLC          | 0014512891                           | 5562                                  |
| MetroPCS Florida, LLC             | 0014545644                           | 5562                                  |
| MetroPCS Georgia, LLC             | 0014512941                           | 5562                                  |
| MetroPCS Massachusetts, LLC       | 0017970328                           | 5562                                  |
| MetroPCS Michigan, LLC            | 0014050579                           | 5562                                  |
| MetroPCS Networks California, LLC | 0015117062                           | 899D                                  |
| MetroPCS Networks Florida, LLC    | 0015117088                           | 899D                                  |
| MetroPCS Nevada LLC               | 0017726019                           | 5562                                  |
| MetroPCS New York LLC             | 0018469460                           | 5562                                  |
| MetroPCS Pennsylvania LLC         | 0017726001                           | 5562                                  |
| MetroPCS Texas, LLC               | 0013336714                           | 5562                                  |
| Assurance Wireless                | 0006901011                           | N/A                                   |

Unless otherwise stated, all descriptions below apply regardless of the role in which T-Mobile acts for any particular call.

### **Full Implementation of STIR/SHAKEN**

T-Mobile has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it carries or processes are compliant with the requirements of Section 64.6301-6303 of the Commission’s rules. T-Mobile also provides interconnected VoIP services on a resold basis and its wholesale service providers have reported implementation of STIR/SHAKEN in the robocall mitigation database.

### **Description of Robocall Mitigation Program**

T-Mobile takes the following specific reasonable steps to avoid carrying or processing illegal robocall traffic:

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<sup>1</sup> *Wireline Competition Bureau Announces Robocall Mitigation Database Filing Deadlines and Instructions and Additional Compliance Dates*, Public Notice, 39 FCC Red 383, n.32 (WCB 2024).

### ***Know-Your-Upstream Provider Program (Gateway, Intermediate and Voice Service Provider)***

- Prior to onboarding any upstream provider that will utilize T-Mobile as a Gateway Provider or Intermediate Provider or terminate traffic to T-Mobile's network in T-Mobile's role as a Voice Service Provider, T-Mobile's procurement team engages in detailed discussions with the prospective partner to understand its business model and validate it is a legitimate entity with a commitment to compliance. T-Mobile will not move forward with onboarding partners about which T-Mobile has compliance concerns.
- T-Mobile includes the following contractual requirements (among others) in agreements with upstream providers:
  - A commitment by the partner not to send T-Mobile improper traffic, including auto-dialer, robocaller, spoofed, or high-volume calls.
  - A commitment by the partner to reasonably cooperate with traceback investigations.
  - A commitment by the partner to meet any STIR/SHAKEN requirements promulgated by the FCC.
  - A commitment by the partner to register in the Robocall Mitigation Database.
  - T-Mobile has the right to suspend service in the event the partner violates these commitments, and to terminate the agreement in the event the provider fails to cure any violation.
  - T-Mobile has the right to immediately suspend or restrict service.
- T-Mobile generates internal reporting to assess the quality of the traffic handed off to T-Mobile by each upstream provider, including:
  - Reporting on the number and frequency of short duration calls handed off to T-Mobile by each upstream provider.
  - Reporting based on analytics concerning the calls handed off to T-Mobile by each upstream provider.
- T-Mobile has internal processes to regularly review the above reporting for each upstream provider and to escalate any concerns directly to the provider for remediation. These internal processes call for incremental escalations, up to and including termination of the contract, if the provider fails to remediate.

### ***Know Your Customers (Voice Service Provider)***

- T-Mobile includes the following contractual requirements (among others) in agreements with its consumer and enterprise customers:
  - A prohibition on using T-Mobile's services to generate abusive, unsolicited, or other mass automated communications.
  - The right for T-Mobile to suspend or terminate service at any time, including for engaging in the prohibited uses.

- T-Mobile includes the following contractual requirements (among others) in agreements with its mobile virtual network operator partners:
  - A requirement that they prohibit their customers from using T-Mobile’s services to generate abusive, unsolicited, or other mass automated communications.
  - A requirement that they retain the right to suspend or terminate service at any time, including for engaging in the prohibited uses.
  - A requirement that they comply with all applicable local, state, and federal laws and all applicable governmental rules and regulations, compliance programs, certifications, and filings.
  - A requirement that they cooperate with T-Mobile in investigating and responding to potential violations of these requirements.
- T-Mobile has technical processes in place to actively monitor traffic originated on its network for patterns of potentially illegal or unwanted calls, and promptly investigates such behavior. T-Mobile also has processes in place to receive reports of potentially illegal calls originated on its network, and similarly promptly investigates such allegations. Such investigations can lead to an escalation to T-Mobile’s fraud team and/or MVNO partners for potential account termination or suspension.

***Identifying and Blocking Illegal Traffic (Gateway, Intermediate, and Voice Service Provider)***

- T-Mobile blocks calls that purport to originate from a number on its do-not-originate list, as well as calls in which the Caller ID field is an invalid number.<sup>2</sup>
- T-Mobile authenticates caller identification information for all calls it receives that use US North American Numbering Plan resources in the caller ID field that, upon receipt by T-Mobile, had not been authenticated upstream and that T-Mobile will exchange with another provider as a SIP call.<sup>3</sup>
- T-Mobile has technical processes to block identified illegal traffic and substantially similar traffic upon receipt of notice by the Commission following the procedures described in Section 64.1200(n)(5) of the Commission’s rules.
- T-Mobile uses analytics provided by First Orion to identify illegal traffic. By default, calls identified by these analytics are labeled as “Scam Likely” for T-Mobile customers. Customers may choose to block those calls.
- T-Mobile engages with its wholesale VoIP service providers to assure that they or their service providers adopt robocall mitigation plans that include the identification and blocking of unlawful robocalls. T-Mobile has verified that these service providers have submitted certifications to the FCC’s robocall mitigation database.

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<sup>2</sup> See 47 CFR § 64.1200(o)-(p).

<sup>3</sup> See 47 CFR § 64.6302(c).

### Traceback Commitment

T-Mobile is committed to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. T-Mobile has appointed specific personnel with responsibility for responding to traceback requests and established procedures for complete and timely responses to such requests. T-Mobile is also committed to cooperating with the FCC, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use T-Mobile's service to carry or process illegal calls.