



ROBOCALL MITIGATION PLAN

1. INTRODUCTION

Directo Telecom S.A. de C.V. ("Directo Telecom") is a Mexico-based telecommunications provider that originates international voice traffic, including traffic destined for the United States utilizing U.S. North American Numbering Plan (NANP) resources. Directo Telecom is organized under the laws of the United Mexican States and holds telecommunications operating authorization granted by the Instituto Federal de Telecomunicaciones (IFT) under Concession/Authorization No. FET005262CO-100400.

Directo Telecom maintains a filing in the FCC Robocall Mitigation Database as a foreign voice service provider that does not directly introduce calls into the United States public switched telephone network (PSTN) but transmits all U.S.-bound traffic through its affiliated U.S. entity, ComputerTel Inc. (dba Directo) ("ComputerTel"), in accordance with 47 CFR Section 64.6305(f). As such, Directo Telecom is not directly subject to the STIR/SHAKEN implementation requirements applicable to U.S.-based voice service providers under 47 CFR Section 64.6301, but is required to implement a robocall mitigation program consisting of reasonable steps to prevent the origination of illegal robocall traffic, as fully described herein.

Directo Telecom provides services to enterprise customers and transmits traffic to its affiliated U.S. entity, ComputerTel Inc. (dba Directo), which acts as its sole U.S.-based gateway provider and performs STIR/SHAKEN authentication and additional mitigation measures prior to entry into the U.S. network.

Prior Enforcement Actions: Within the prior two years, neither Directo Telecom nor any entity sharing common ownership, management, directors, or control with Directo Telecom (including ComputerTel Inc.) has been the subject of any formal Commission, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing related to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or related to a deficient Robocall Mitigation Database certification or mitigation program description. (Required disclosure under 47 CFR § 64.6305(d)(2)(iv), (e)(2)(iv), and (f)(2)(iv).)

2. ROLE IN THE CALL PATH

Directo Telecom operates as:

Voice Service Provider (Originating Provider) — originating traffic from enterprise customers located outside the United States

Upstream Provider to a U.S. Gateway — transmitting traffic to ComputerTel Inc., which performs authentication and downstream routing within the United States

Directo Telecom does not perform STIR/SHAKEN authentication and does not independently assign STIR/SHAKEN attestation levels. All authentication and attestation decisions are performed by its affiliate, ComputerTel Inc.

Directo Telecom provides sufficient customer identity and number right-to-use information to enable ComputerTel Inc. to perform STIR/SHAKEN authentication and assign appropriate attestation levels.

3. ROBOCALL MITIGATION PROGRAM – REASONABLE STEPS

Directo Telecom implements a robocall mitigation program consisting of reasonable and effective measures to prevent the origination and transmission of illegal robocall traffic.



3.1 Know Your Customer (KYC) / Know Your Traffic (KYT)

Directo Telecom performs due diligence prior to onboarding all customers, including:

- Legal identity verification (corporate documents, registration)
- Verification of legal representative authority
- Tax identification and business records
- Proof of address
- Contact information validation
- Business activity review
- Proof of number ownership / right-to-use
- Business reference and credit checks

New and Renewing Customer Controls:

- Periodic re-verification of existing customers
- Enhanced monitoring of customers during initial traffic ramp-up
- Periodic re-screening of customers upon contract renewal, or if traffic patterns change
- Immediate escalation and suspension for customers linked to illegal robocall campaigns

In its role as a Voice Service Provider, Directo Telecom applies these KYC/KYT procedures specifically to prevent customers from originating illegal robocall traffic. Directo Telecom does not originate traffic on behalf of any customer that cannot be verified or that presents an unacceptable risk of illegal robocalling.

These measures satisfy the FCC requirement to take affirmative, effective steps to prevent new and renewing customers from originating illegal robocalls.

Directo Telecom maintains documentation sufficient to support downstream verification of customer identity and right to use telephone numbers.

3.2 Contractual Controls

Directo Telecom includes contractual provisions prohibiting:

- Caller ID spoofing
- Traffic masking
- Re-origination schemes
- Any unlawful robocalling activity

Violations result in:

- Immediate blocking
- Contract termination

3.3 Traffic Monitoring and Analytics

Directo Telecom conducts 24/7 continuous monitoring of all network traffic.

Monitoring includes:

- Detection of abnormal traffic spikes
- Identification of short-duration calls



- Analysis of traffic patterns inconsistent with legitimate use

Suspicious traffic is:

- Investigated by technical and fraud teams
 - Escalated internally
 - Raised with customers for explanation
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3.4 Active Mitigation and Enforcement

Where traffic is determined or reasonably suspected to be illegal:

- Customer is immediately notified
- Traffic is blocked or rerouted
- Services may be suspended or terminated

Directo Telecom applies a precautionary approach, including mitigation based on reasonable suspicion where necessary to protect downstream networks.

3.5 Coordination with ComputerTel (dba Directo)

Directo Telecom coordinates closely with ComputerTel to ensure:

- Traffic transmitted to the United States is subject to downstream authentication and mitigation
- Customer identity and number usage information is available to support STIR/SHAKEN attestation decisions
- Suspicious traffic identified by either entity is promptly addressed and mitigated

Directo Telecom provides sufficient information to ComputerTel to enable:

- Verification of customer identity
- Validation of number right-to-use
- Appropriate assignment of STIR/SHAKEN attestation levels

Directo Telecom ensures that sufficient customer and number verification information is provided to ComputerTel Inc. to support STIR/SHAKEN authentication and attestation requirements.

4. TRACEBACK AND LAW ENFORCEMENT COOPERATION

Directo Telecom commits, in accordance with 47 CFR § 64.6305(a)(2), (b)(2), and (c)(2), to:

- Cooperate with ComputerTel Inc., the FCC, law enforcement, and the Industry Traceback Group
- Respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (currently USTelecom's Industry Traceback Group)
- Cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use Directo Telecom's service to originate, carry, or process calls
- Taking action against customers identified through traceback as sources of illegal traffic, up to and including immediate blocking and termination

Directo Telecom maintains internal procedures to ensure rapid identification of call paths and long-term preservation of call detail records (>2 years).



5. UPSTREAM AND DOWNSTREAM RESPONSIBILITY

Directo Telecom recognizes its responsibility as an upstream provider and:

- Monitors traffic prior to transmission to the U.S.
- Prevents the transmission of traffic reasonably suspected to be illegal
- Supports downstream mitigation efforts by ComputerTel Inc.

6. FCC NOTIFICATION AND MANDATORY BLOCKING

Directo Telecom will, to the extent applicable and as coordinated with ComputerTel Inc.:

- Upon receipt of a Notification of Suspected Illegal Traffic from the Commission, effectively mitigate the identified traffic promptly, and within any timeframe specified by the Commission by identifying the source and preventing that source from continuing to originate, carry, or process traffic of the same or similar nature, consistent with 47 CFR § 64.1200(f)(18) and (n)(2)
- Within 14 days of such Notification, implement effective measures to prevent new and renewing customers from using Directo Telecom's network to originate, carry, or process illegal calls, and inform the Commission and the Traceback Consortium of the steps taken
- Promptly comply with any Initial Determination Order and Final Determination Order issued by the Commission, including blocking traffic from identified originators within the timeframes specified by the Commission

7. ROBOCALL MITIGATION DATABASE COMPLIANCE

Directo Telecom:

- Maintains an accurate and current filing in the FCC Robocall Mitigation Database
- Updates filings within required timeframes

8. CONTINUOUS IMPROVEMENT

Directo Telecom continuously evaluates and enhances its robocall mitigation controls to comply with evolving FCC rules and industry best practices.

Directo Telecom will recertify and resubmit its filing in the FCC Robocall Mitigation Database annually on or before March 1, in accordance with 47 CFR § 64.6305(h), and will update its filings within ten (10) business days of any material change to the information required under 47 CFR § 64.6305(d)–(f).

9. CONTACT INFORMATION

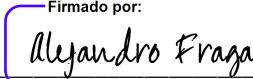
Fraud & Abuse Contact:

- Email: fraud@directo.com; support@directo.com; noc@directo.com
 - Phone: +52-55-5201-4550
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CERTIFICATION

I hereby certify, under penalty of perjury and in conformity with 47 CFR § 1.16, that I am an officer of Directo Telecom S.A. de C.V. and authorized to make this certification on the company's behalf; that all calls that Directo Telecom originates, carries, or processes are subject to the robocall mitigation program described above; that the information contained in this Robocall Mitigation Plan is true and correct to the best of my knowledge, information, and belief; that Directo Telecom commits 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; and that Directo Telecom's prior certification has not been removed by Commission action and Directo Telecom has not been prohibited from filing in the Robocall Mitigation Database.

Signature:  Firmado por:
72BC7FD749664DF...

Name: Luis Alejandro Fraga Land

Company: **Directo Telecom, S.A. de C.V**

Title: Legal representative

Date: **14 May 2026**

Address: Torre Esmeralda I, Blvd. Manuel Ávila Camacho #40 Piso 24, Lomas de Chapultepec III, CDMX, C.P. 11000, MEXICO