

**BHARTI AIRTEL (UK) LIMITED
ROBOCALL MITIGATION PLAN
UPDATED FEBRUARY 28, 2026**

INTRODUCTION

Bharti Airtel (UK) Limited (Airtel), Federal Registration Number 0031099351, pursuant to Sections 64.6301 and 64.6305 of the Commission's rules, 47 C.F.R. §§ [64.6301](#), [64.6305](#), and the Commission's "Best Practices"¹ as amended² adopts this Caller ID Authentication ("Plan"). This Plan is current as of its submission date and may be subject to change as necessary to further comply with amended Commission regulations and requirements.

The objective of this document is to provide Bharti Airtel (UK) Limited (Airtel) Robocall Mitigation Plan as required by Commission's Rules under 47 C.F.R §64.6300(c) and explain specific steps Airtel is taking as a part of its robocall mitigation efforts.

COMPANY INFORMATION

The name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues is:

Stefano Pascucci

Director

Bharti Airtel (UK) Limited

10 Queen Street Place,

London, EC4R 1AG,

United Kingdom.

Email: Stefano.Pascucci@airtel.com

Contact: +15162051300

Bharti Airtel (UK) Limited (Airtel) is a United Kingdom based licensed Telecom Operator. Together with its global subsidiaries / affiliates, Airtel provides telecom services (including but not limited

¹ *Call Authentication Trust Anchor*, WT Docket No. 17-97 *Wireline Competition Bureau Invites Comment on Caller ID Authentication Best Practices*, WC Docket No. 20-324, *Wireline Competition Bureau Issues Caller ID Authentication Best Practices*, DA 20-1526 (December 22, 2020)

² *Advanced Methods to Target and Eliminate Unlawful Robocalls*, *Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17- 97, *Sixth Report and Order*, *Fifth Report and Order*, *Order on Reconsideration*, *Order*, FCC 22-37 (May 20, 2022) and *Call Authentication Trust Anchor*, WC Docket No. 17-97, *Sixth Report and Order*, FCC 23-18 (March 17, 2023), *Seventh Report and Order*, FCC 23-37 (May 19, 2023), and *Eighth Report and Order*, FCC 24-120 (November 22, 2024) and *Advanced Methods to Target and Eliminate Unlawful Robocalls* proceeding, CG Docket No. 17-59, *Eighth Report and Order* FCC 25-15 (February 28, 2025).

to international wholesale voice transit) to other Telecom operators and wholesale carriers around the world.

Fraud prevention is an integral service provided to Airtel's wholesale and enterprise customers.

For purpose of this RMP filing, Airtel explains its role as a foreign service provider, i.e. it provides wholesale services - receiving and sending international wholesale voice traffic to international carriers with whom Airtel holds contractual arrangements. Airtel's voice traffic is in nature of Transit Traffic, the traffic that is collected from international carriers and terminated internationally using its carrier partners including for the USA.

CERTIFICATION

Airtel certifies that it has not been prohibited from filing in the Robocall Mitigation Database. Airtel certifies further that it has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing. And Airtel certifies that at no time during the prior two years has Airtel has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Airtel further certifies that it does not separately engage a third-party analytics provider.

And, pursuant to Section 64.6305(h) of the Commission's rules, 47 C.F.R. § 64.6305(h). Airtel affirmatively certifies and will recertify annually that any information submitted to the Robocall Mitigation Database is true and correct on or before March 1.

STEPS TAKEN BY AIRTEL TO MONITOR AND PREVENT ILLEGAL ROBOCALLS FROM ORIGINATING FROM ITS NETWORK

- i. This Robocall Mitigation Plan addresses the steps Airtel has implemented to preclude unlawful calls in compliance with applicable Commission rules.
- ii. Airtel has policies and systems designed to detect and prevent fraudulent traffic, potentially suspicious traffic patterns, and other unwanted activities on its platform that are likely to be associated with illegal robocalls or other potentially unlawful usage.
- iii. As a safeguarding principal BAL UK has deployed a tool namely, Empirix, used for monitoring telecom traffic to identify patterns that may indicate probable spam, fraudulent, or robocalling activity. The system highlights traffic that matches predefined criteria associated with such traffic behavior.
- iv. **Suspending/ Mitigating Illegal Traffic:**

Airtel immediately blocks its affiliates and other interconnecting upstream carriers' traffic originating from designated telephone numbers when so requested by upstream carriers in the event that actual or potential unauthorized traffic has been detected.

v. **Description of "Know Your Upstream Provider" Procedures in Place:**

For all upstream carriers that Airtel accepts traffic from, Airtel has reasonable processes in place for "know your customer". Airtel seeks the required information from carrier customers / partners, who may provide all or some of this information for purpose of due diligence.

New or renewing customers are required to affirmatively acknowledge and accept Airtel's conditions associated with the use of its service. The customer has to agree that in the event if any false information is provided in the KYC document, it would lead to termination of any commercial arrangement with Airtel or any of its affiliates and will attract criminal liability under applicable laws.

vi. **Existing Contractual Terms**

Airtel includes appropriate and relevant terms in its commercial contracts with customers that can reasonably be expected to significantly reduce the origination of illegal calls.

In the service agreement the upstream provider ("*client*") signs with Airtel, obligations are established for the client to use the contracted service only for legal purposes, and not use it at any time to carry out prohibited practices. Under the service contract, prohibited practices, inter alia, include: (i) using the service for spam messages/calls (ii) using the service for fraudulent, criminal or illegal purposes. The service agreement explicitly states that the termination of traffic in the agreed destinations shall be subject to the applicable laws and regulations regarding spam in the terminating territory.

If it is detected client engages in any of the aforementioned prohibited practices, Airtel reserves the right to terminate the contract, and suspend the services totally or partially, temporarily or permanently, in compliance with the applicable laws and regulations

vii. **Refusing Traffic from Unlisted Providers**

Airtel refuses to accept traffic from unlisted and de-listed providers from the Commission's Robocall Mitigation Database.

COOPERATION WITH THE COMMISSION, INDUSTRY TRACEBACK CONSORTIUM, AND LAW ENFORCEMENT AGENCIES

Airtel is committed to working with the Federal Communications Commission for prevention of illegal robocalling, fraudulent calling and other illegal use of its network, and, with support from

the users of its facility, it will continue to monitor and evolve its response approach to deal with illegal robocalls.

Airtel will respond fully to all traceback requests from the Commission, law enforcement, and the industry traceback consortium as soon as possible and at no time exceeding 24 hours³ from the time of the request and will cooperate with such entities in investigating and stopping any illegal robo-callers that use its service to originate calls.

COMMITMENT

Airtel commits to take all such *reasonable steps* to avoid originating illegal robocall traffic.

Airtel anticipates that its Plan will evolve as it makes Plan enhancements, as underlying carriers enhance their own plans, and as the Trust Anchor and industry generally gain experience in caller ID authentication protocols.

February 28, 2026,

Bharti Airtel (UK) Limited



Stefano Pascucci

Address: 10 Queen Street Place,
London, EC4R 1AG,
United Kingdom.
Contact: +15162051300

³ Pursuant to 47 C.F.R. § 64.1200(n)(1) as clarified by the Commission.