



ROBOCALL MITIGATION PLAN

This document describes Ligado Networks Subsidiary LLC's ("Ligado") robocall mitigation plan to detect and prevent unlawful robocalls from originating on its network consistent with the FCC's *Sixth Caller ID Authentication Report and Order* (Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (Mar. 17, 2023)).

Corporate Information

Ligado is a Delaware limited liability company.

Ligado certifies it has not been prohibited from filing in the Robocall Mitigation Database and Ligado has not been subject to any Commission, law enforcement, or regulatory agency action or investigation arising from suspected unlawful robocalling or spoofing.

In accordance with 47 CFR § 64.6305(e), Ligado has designated a point of contact to receive notice of illegal robocall traffic or other robocall mitigation-related issues. That person's name, title, address, phone number and email are available in the Robocall Mitigation Database.

Ligado is a mobile satellite service business that originates Voice/Data and Push to Talk Services to customers from its network. Voice calls are originated as SIP calls and then handed off to Ligado's vendor, Alianza, Inc. ("Alianza") for routing. Ligado does not have its own voice switching capability.

STIR/SHAKEN EXEMPTION

Ligado is a reseller of white-labeled services offered by Alianza for which Ligado does not control the softswitch, number porting or call trunking for the associated calls. In the Second Caller ID Authentication Report and Order, 36 FCC Rcd 1859, 1868, para. 19 (citing First Caller ID Authentication Report and Order, 35 FCC Rcd at 3260, para. 40), the Commission stated that such providers do not have a STIR/SHAKEN obligation ("And we clarified that voice service providers which lack control over the network infrastructure necessary to implement STIR/SHAKEN are not subject to our implementation requirements.")

Ligado is also a mobile satellite service business that provides voice/data and push to talk services to customers from its network. Ligado provides calls via satellite using North American Numbering Plan (NANP) numbers. As a satellite provider using NANP numbers that has fewer than 100,000 voice subscribers, Ligado would also be eligible for the extension provided for under Section 64.6304(a)(1)(iii) of the Commission's rules.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

Ligado and its affiliates, in partnership with Alianza, follow the best practices for the implementation of call authentication frameworks recommended by the NANC Call Authentication Trust Anchor Working Group <https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>.

Ligado confirms the identity of new commercial customers by obtaining the following information: (i) contact person(s), (ii) business location, (iii) state or country of incorporation, (iv) federal tax identification and (v) the nature of our customers' businesses.

At this time, Ligado does not serve businesses that originate high call volumes, and only a small number of end users originate voice calls from Ligado's network in North America. These customers use prearranged telephone numbers associated with their businesses, and only numbers Ligado has confirmed are controlled and assigned to the customer are allowed to originate calls from Ligado's network.

In addition, most of Ligado's customers do not have the technical ability or access to their telephony service in such a way as to allow them to change Caller ID from that which is assigned. If a customer wants to change their Caller ID, the Service Provider will have to do this on their behalf.

Given the low volume of voice traffic, any spikes in traffic using Ligado's customers' numbers would be recognized immediately as suspicious and investigated. If Ligado's upstream provider receives a call with a Ligado number that does not come from Alianza, the upstream provider will not certify the call.

II. KNOW YOUR UPSTREAM PROVIDER

Ligado does not have its own separate voice capability. All IP voice functionality and traffic through the satellite are routed to Alianza. Alianza's Cloud Communications Platform has the capability of completing mobile satellite calls to the public switched network via their upstream VoIP carrier, Bandwidth. In addition, Ligado's agreement with Alianza contains fair use and protection policies that allow Alianza to immediately terminate any services to any subscriber or device to prevent automated call blasting, mass calling events, and other fraudulent or illegal activity. Alianza has also separately certified to the Commission through its Robocall Mitigation Plan that all voice traffic originating on its network is authenticated in compliance with applicable standards under 47 CFR §64.6301.

III. TRACEBACK

Ligado will respond to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium within 24 hours. In the unlikely event illegal robocallers use Ligado's network to originate calls, Ligado will cooperate with such entities' investigation.

III. ROBOCALL MITIGATION PROGRAM

STIR/SHAKEN Compliance includes the obligation to accurately identify subscribers that are tied to a telephone number-based caller identity associated with that subscriber. Ligado's customers use mobile satellite voice services within specialized industries that include public safety, oil and gas, commercial shipping, etc. Mobile satellite calls use 500/600 numbers that are not tied to particular area codes and are passed on as "No Caller ID."

Ligado has taken the following actions to comply with the Robocall Mitigation Caller ID requirement:

Calling ID Insertion – Outgoing MT to PSTN. Ligado has added to its network the capability of including the DID/TFN for a unit making a call on our network. The call is then routed to Alianza, which forwards the call request to Bandwidth, their upstream provider.

Bandwidth will then verify and certify the call based on where it originated (Ligado/Alianza) and the Calling ID in the call request, allowing Level A Attestation. If Bandwidth detects the call is coming from (Ligado/Alianza) but does not include a Calling ID, Bandwidth will certify a Level C Attestation.

If the upstream providers determine the call did not originate from (Ligado/Alianza), the call will not be certified and will fail.

IV. PLAN UPDATES

Ligado will continue to monitor industry best practices and review internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.