

BHARTI AIRTEL (USA) LIMITED

ROBOCALL MITIGATION PLAN

Updated February 28, 2026

INTRODUCTION

Bharti Airtel (USA), Limited (“BAL USA”), Federal Registration Number [0016827297](#), 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.

With this update, BAL USA incorporates amendments to its Plan to further document compliance with Commission Caller ID Authentication rules, most recently including rules promulgated under the Commission’s *Report and Order* in its Improving the Effectiveness of the Robocall Mitigation Database and Amendment of Part 1 of the Commission’s Rules, Concerning Practice and Procedure, Amendment of CORES Registration System proceedings.³

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:

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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).

³ *Report and Order*, WC Docket No. 24-213, MD Docket No. 10-234, [FCC 24-135](#) (January 8, 2025),

BAL USA is a subsidiary of Bharti Airtel Limited, an India-based licensed Telecom Operator (Mobile Network Operator, and, also as a Carrier). Bharti Airtel Limited, together with its global subsidiaries / affiliates provides telecommunications and communications services including but not limited to international wholesale voice transit to other carriers, wholesale carriers and enterprise customers around the world. Fraud prevention is an integral service provided to Bharti Airtel Limited's wholesale and enterprise customers.

BAL USA is a *gateway intermediate service provider* pursuant to 47 C.F.R §64.6300(i). BAL USA does not serve end users and neither originates any voice traffic on its own nor terminates to end subscribers, accordingly.

BAL USA provides switching transiting services exclusively in the U.S. to enable international wholesale carriers/resellers to exchange voice traffic with their US or other global wholesale or international long distance carriers/resellers under their respective agreements by facilitating technical interconnection established between those respective networks. BAL USA does not operate under any assumed names.

BAL USA does not act as a wholesale provider originating calls on behalf of another provider or providers. does not maintain an operating company number and does not have direct access to telephone numbers from the North American Numbering Plan Administrator (NANPA) and/or the National Pooling Administrator.

EXEMPTION

BAL USA is a ***gateway intermediate service provider*** as defined in 47 C.F.R § 64.6300(d) and (i). BAL (USA) neither originates nor terminates voice traffic to end users. BAL (USA) is currently incapable of obtaining a Service Provider Code ("SPC") token due to Governance Authority policy and is exempt from the requirements of [Section 64.6301](#) until it is capable of obtaining a SPC token as set forth in Section 64.6304(b) of the Commission's rules, 47 C.F.R. § 64.6304(b).

CERTIFICATION

BAL USA certifies that it has not been prohibited from filing in the Robocall Mitigation Database. BAL USA 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 BAL USA certifies that at no time during the prior two years, has BAL USA 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.

BAL USA 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). BAL USA affirmatively certifies and will recertify annually that any information submitted to the Robocall Mitigation Database is true and correct on or before March 1.

REASONABLE STEPS TAKEN TO MONITOR & PREVENT ILLEGAL ROBOCALLS - FRAUD CALL ANALYSIS & MANAGEMENT

- i. This Robocall Mitigation Plan addresses the steps BAL USA has implemented to preclude unlawful calls in compliance with applicable Commission rules.
- ii. As BAL USA only switches traffic⁴ and does not serve end users who originate calls the review and monitoring of this traffic lie with the wholesale carriers/resellers transiting their voice traffic specially when the traffic termination through BAL USA.. In addition to this and as a safeguarding principal BAL USA has deployed Empirix, an application 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.

iii. Suspending/ Mitigating Illegal Traffic:

BAL USA will immediately block 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.

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

BALUSA maintains service contracts with interconnecting carriers that establish the terms and conditions under which BAL USA will provide transiting services, including provisions governing robocall mitigation.

⁴ The international (transit) traffic contractually agreed to be exchanged between any two carriers, using BAL USA switch.

v. **Existing Contractual Terms:**

BAL USA and its affiliates ensure to keep appropriate and relevant terms in their commercial contracts with customers that can reasonably be expected to significantly reduce the origination of illegal calls.

Under the terms and conditions of BAL USA's service contract, upstream providers ("*client*") are legally obligated to use the contracted service exclusively for legal purposes, and not use it at any time to carry out prohibited practices.

Under BAL USA's 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, BAL USA 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.

vi. **Refusing traffic from unlisted providers:**

BAL USA only accepts traffic from its affiliates and carriers with whom it has established service agreements. Notwithstanding the foregoing, BAL USA and its affiliates will refuse 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

BAL USA is committed to work 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.

BAL (USA) 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 hours⁵ 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.

⁵ Pursuant to 47 C.F.R. § 64.1200(n)(1) as clarified by the Commission.

DO-NOT-ORIGINATE LIST

Pursuant to the Commission's Eighth Report and Order in its Advanced Methods to Target and Eliminate Unlawful Robocalls proceeding, BAL USA compiles a reasonable do-not-originate list, as applicable. This do-not-originate list excludes numbers that are deemed unreasonable for purposes of call origination in accordance with the criteria established pursuant to 47 C.F.R. § 64.1200, as they are discovered.

COMMITMENT

Pursuant to Section 64.6305 of the Commission's rules, 47 C.F.R. § [64.6305](#), BAL USA commits to take all such *reasonable steps* to avoid originating illegal robocall traffic.

BAL USA will ensure that it will update company information contained in the Commission Registration System (CORES) within ten business days from the date when information changes to reflect up-to-date Company information. Further, pursuant to Section 64.6305(h) of the Commission's rules, 47 C.F.R. § 64.6305(h) BAL USA affirmatively certifies and will recertify annually that any information submitted to the Robocall Mitigation Database is true and correct on or before March 1.

BAL USA 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.

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