

Telecall Updated Robocall Mitigation Plan

Telecall Telecommunications Corp., d/b/a Telecall ("Telecall") submits this Robocall Mitigation Plan ("RMP") in its capacity as a gateway provider and as a non-gateway intermediate provider, pursuant to 47 CFR § 64.6305. All voice traffic that is carried or processed through Telecall's facilities are subject to this RMP.

I. Telecall's Roles in the Call Chain

On a given call, Telecall may act in the role of (1) a gateway provider as defined in 47 CFR 64.6300(d); or (2) a non-gateway intermediate provider as defined in 47 CFR § 64.6300(g).

II. Full Implementation of STIR/SHAKEN

Telecall has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls, it carries or processes in its capacity as a gateway provider and non-gateway intermediate provider are compliant with the requirements of Section 64.6302 of the Commission's rules.

In addition, Telecall conducts regular internal audits and monitoring activities to assess its partners' compliance with applicable robocall mitigation requirements, contractual obligations, and regulatory standards. Any identified issues are promptly addressed through corrective actions, up to and including suspension or termination of the relationship when necessary.

III. Description of Robocall Mitigation Plan

Telecall takes specific reasonable steps in its capacity as a gateway provider and as a non-gateway intermediate provider to avoid carrying or processing illegal robocall traffic as part of its RMP. Telecall believes that these practices can reasonably be expected to significantly reduce the carrying or processing of illegal robocalls. Telecall also engages in internal periodic reviews to

evaluate the effectiveness of robocall mitigation practices, and identify and implement updates to these procedures as necessary.

These monitoring activities are complemented by periodic internal audits of upstream providers to ensure ongoing compliance with Telecall's robocall mitigation policies and applicable regulations.

A. Know Your Customer

Telecall has established and implemented comprehensive "Know Your Customer" ("KYC") policies for all new and existing customers. The objective of the KYC policy is to prevent Telecall from inadvertently carrying or processing illegal robocalls on behalf of its customers.

As part of this policy, Telecall requests information from upstream providers about their operations, including but not limited to foreign ownership; type of business; customer base; traceback history; and acceptable use policy. Telecall also requires customers to verify that they are in compliance with relevant rules, and/or describe their own policies, including but not limited to: timely participation in ITG tracebacks and relevant traceback processes; compliance with telemarketing regulations; compliance with robocall mitigation database filing requirements and other robocall related requirements.

In addition, Telecall checks publicly available information (including FCC actions) to determine if the provider seems likely to be the source of illegal robocalls or be affiliated with such providers.

B. Contractual Protections

Telecall strives to include certain contractual protections in agreements with upstream providers that are designed to prevent the transmission of illegal robocalls. These provisions may include, but not be limited to the following:

- A commitment by the partner not to send Telecall improper or illegal traffic, including auto-dialer, robocaller, spoofed, or high-volume calls.

- A commitment by the partner to reasonably cooperate with traceback or other law enforcement 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.
- The right of Telecall to immediately suspend or restrict service, in its sole discretion, in the event the partner violates these commitments, and to terminate the agreement in the event the provider fails to cure any violation.

C. Traffic Monitoring

Telecall generates internal reporting to assess the quality of the traffic handed off to Telecall by each upstream provider, including:

- Reporting on the number and frequency of short duration calls handed off to Telecall by each upstream provider.
- Telecall regularly reviews these reports and engages the upstream provider in the event that there is seemingly illegal traffic. In the event the customer does not provide information on the traffic or fails to mitigate any illegal traffic, Telecall utilizes the above contractual provisions, including restricting or suspending service from the customer.

Telecall will promptly investigate and mitigate illegal robocall traffic that is brought to its attention through measures such as internal monitoring and traceback requests.

D. Call Blocking and Call Mitigation Technologies

Telecall has implemented policies, procedures, and technical safeguards designed to identify, mitigate, and block illegal, unwanted, or potentially fraudulent calls across its network. These measures operate in conjunction with Telecall's traffic monitoring and customer compliance framework to provide layered protection against unlawful robocall activity.

Telecall blocks calls and substantially similar traffic when notified by the Commission pursuant to 47 C.F.R. § 64.1200(n). In addition, Telecall blocks calls that purport to originate from numbers appearing on a reasonable do-not-originate (“DNO”) list or from invalid North American Numbering Plan numbers. Telecall continuously reviews and updates its DNO controls to ensure accuracy and effectiveness.

Telecall supports compliance with applicable federal and state Do-Not-Call (“DNC”) requirements by consulting available DNC resources and utilizing them as a reference point in evaluating calling patterns and potential unlawful traffic. Telecall does not manage DNC lists on behalf of its customers; however, where traffic patterns, complaints, or investigative findings indicate potential DNC-related concerns, Telecall conducts a review and may engage the customer to obtain information regarding the nature of the traffic and applicable compliance measures. Based on the results of such review, Telecall may implement appropriate corrective actions, including enhanced monitoring, traffic restrictions, suspension, or termination of service where warranted.

In addition, Telecall utilizes SmartShield™, an AI- and machine-learning–based call analysis solution, as part of its call blocking and mitigation framework. SmartShield™ provides insight into the quality of customer traffic by analyzing selected calls for contextual, behavioral, and intent-based indicators commonly associated with scam and fraudulent activity. The system performs random sampling of calls traversing Telecall’s network and supports analysis across multiple languages, expanding Telecall’s ability to detect potentially unlawful or suspicious traffic that may not be identifiable through traditional rule-based methods. SmartShield™ may be enabled on designated ingress trunks (peer groups) to provide targeted monitoring and visibility. Information derived from SmartShield™ analysis is used to support Telecall’s traffic investigations and mitigation decisions, which may include enhanced monitoring, customer engagement, traffic restrictions, blocking, or suspension where appropriate.

When traffic meets defined risk thresholds, Telecall may automatically block, throttle, or flag the traffic for further investigation. Detection parameters are periodically reviewed and adjusted to reflect evolving fraud patterns, regulatory developments, and industry best practices.

IV. Traceback Commitment



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Telecall is committed to responding fully and within twenty-four (24) hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperating with the FCC, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use Telecall's service to carry or process illegal calls. To assist the company in fulfilling these commitments, Telecall has appointed specific company personnel with responsibility for timely responding to Traceback requests and has established internal procedures for producing complete and timely responses to such requests.



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Ownership Addendum
Telecall Telecommunications Corp. d/b/a Telecall
Robocall Mitigation Database
November 5, 2024

Telecall Telecommunications Corp., d/b/a Telecall (“Telecall” or the “Company”) submits the below information regarding its principals, affiliates, subsidiaries, and parent companies, including information regarding any principal(s) that exercise management or control of the Company.

Ownership Information:

- **Allan Kelman Ajuz**, an individual, holds a total approximate amount of 25% of the equity in the company. This ownership is a combination of direct holdings and indirect holdings via CAJUZ (a holding company).
- **Bruno Kelman Ajuz**, an individual, holds a total approximate amount of 25% of the equity in the company. This ownership is a combination of direct holdings and indirect holdings via BAJUZ (a holding company).
- **Cleber Costa Ajuz**, an individual, holds a total approximate amount of 50% of the equity in the company. This ownership is held indirectly through a Trust and CAJUZ (a holding company). Mr. Cleber Ajuz exercises ultimate control over the company.
 - The name of the Trust is The ABCDV Trust. Mr. Cleber Costa Ajuz serves as the Original Trustee, Settlor, and Primary Beneficiary.

Subsidiary Information:

The following companies are wholly-owned subsidiaries of Telecall, unless otherwise noted:

- Telecall Participações S.A
- Ligue Telecom. Ltda
- Telecall Colombia SAS
- Telecomlobia Group LLC
- Stratus Cloud Service LLC
- Telexperts Telecom. S.A
- In Reach Com. e Serv. Ltda
- Stratus Brasil Participações SA * (99% of this company is held by Telecall)
- Stratus Games do Brasil Ltda* (98% of this company is held by Telecall)



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