

DOCOMO PACIFIC, INC.
ROBOCALL MITIGATION CERTIFICATION AND PLAN

This robocall mitigation plan is for **Docomo Pacific, Inc.**, with headquarters at 890 S. Marine Corps Drive, Tamuning, Guam, 96913.

Docomo Pacific, Inc. is a voice provider with STIR/SHAKEN obligation acting as a wholesaler provider.

STIR/SHAKEN

We have registered with the STI-PA using OCN 3945 and 897F. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have fully implemented a STIR/SHAKEN solution supplied by TransNexus.

All voice traffic originates on our network is subject to the attached Robocall Mitigation Plan.

Docomo Pacific, Inc. and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal Commission, law enforcement, 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.

Docomo Pacific, Inc. has not been prohibited from filing a certification in the Robocall Mitigation Database.

Traceback – **Docomo Pacific Inc.** commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. **Docomo Pacific, Inc.** will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use their service to carry, process, or originate robocalls.

Robocall Mitigation Plan

Docomo Pacific, Inc. uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list.

We perform the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

We use call analytics software provided by TransNexus to monitor all outbound voice traffic in real-time to prevent the origination or transit of illegal robocalls.

To mitigate illegal robocalls and protect the integrity of its network, Docomo Pacific, Inc. includes strict provisions within its Terms and Conditions, specifically Section VI. Misuse of Services, Network, or Devices. End-users are prohibited from using DOCOMO PACIFIC Services, the DOCOMO PACIFIC network, or any devices which may adversely impact, affect or interfere with the DOCOMO PACIFIC network, service levels, operations, reputation, or ability to provide quality service to all subscribers as a whole. DOCOMO PACIFIC reserves the right to protect its network from misuse, harm, compromised capacity, or degradation in performance which may impact network performance for all Customers. DOCOMO PACIFIC MAY LIMIT, SUSPEND OR TERMINATE YOUR SERVICES OR AGREEMENT WITHOUT NOTICE, if you, any user of your subscribed Services, or any user on your account are found in violation of this Agreement. Misuse can be defined as (but not limited to): (1) using devices or the Services to engage in unlawful activity, or engaging in conduct that adversely affects our customers, employees, business, or any other person(s); (2) by “spamming” or engaging in other abusive or unsolicited communications; (3) excessive data usage through server devices or host computer applications, including (but not limited to): web camera posts or broadcasts, automatic data feeds, automated machine to machine connections or peer to peer file sharing, lines for full time or dedicated data connections. Tampering, modifying, or reprogramming devices used to access Services is prohibited. Rebilling or reselling our Services without authorization is prohibited. DOCOMO PACIFIC may but is not required to monitor your compliance or the compliance of other subscribers with DOCOMO PACIFIC’s terms, conditions, or policies.

Know Your Customer

- For residential customers, Docomo Pacific, Inc. performs credit checks for customers wanting to establish an account.

- For business customers, Docomo Pacific, Inc. requires the submission of a valid business license issued by the Government of Guam and/or CNMI to establish the validity of the business to operate.

Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

We establish an understanding of the upstream provider's role in the call path for the traffic they will send to us, for example, whether they are acting as an originating voice service provider, a foreign intermediate provider, or a U.S.-based intermediate provider. We use this information to understand whether we will be obligated to authenticate unsigned traffic that we receive from them.

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback. Docomo Pacific, Inc. will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.