

To:

Federal Communications Commission

EUA

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Date: 29th June 2021

Subject: **Activities implemented by Tmcel to avoid originating illegal robocall traffic**

Tmcel is a Mozambique nationwide fixed and mobile telecommunications service provider and cross-border through wholesale, interconnect, and roaming services. Headquarters is based in Maputo with regional offices and delegations in all provinces throughout the country.

With the Recent merger and the emergence of Tmcel, the company embarked on a reengineering exercise with the aim to unify the fixed and mobile operations and has its Integrated Quality, Environment, Health and Occupational Safety Management System audited in late October.

As part of the requirement for Tmcel to terminate voice traffic to the interconnect service provider AT&T and to adhere to the Federal Communications Commission (FCC) on actions implemented by the foreign voice service providers to avoid originating illegal robocalls, we hereby outline the activities:

1. Prevention methods

As prevention of origination of robocalls from our network, Tmcel has put in place the following audit controls.

- a) Registration of our customers as per National regulatory laws that states that all customers must be registered with the Telecommunications provider, providing information on complete name, address, and National Identification document number.

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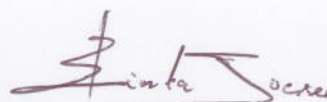
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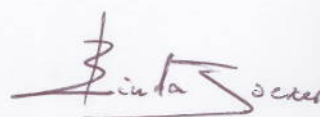
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- b) Postpaid customers are credit vetted to evaluate the credit record and reputation of the customer.
- c) Internal fraud policies ensure that clients who have for one reason or other, knowingly committed any of the telecom fraud within our network are suspended of services.
- d) PRS/IRSF/SPAM and Wangiri fraud controls that consists prevention methods for the fraud that includes the sending SMS (with content from contests to false prizes), Short Voice calls or even installing viruses on customer terminals to originate calls. For these cases Tmcel has methods that identify the suspect calls through CDRS verification, suspension of voice/SMS termination/origination to the MSISDNs involved.
- e) SIMBOX (including robocalls) controls, that prevent/mitigate the type of fraud that consists of routing calls (usually international) with the purpose of terminating in the national territory (on-net and/or off-net) through electronic devices in order to make them local and thereby reduce the cost the same. These are usually characterized by high volume of calls terminated and originated within the network. Measures applied by Tmcel include but are not limited to:
 - Identification via CDRs, voice termination bus and SMS to the numbers involved.
 - Prosecution of offenders with the help of other entities to hold them accountable.
- f) A2P SMS consists of sending SMS through devices capable of generating SMS to the operator's customers. Usually with advertising content or provision of services. The modus operandi include SMS's sent from non-traditional devices or tools (mobile phones) and high volume of SMS received within the network by the device. Measures applied by Tmcel Include, but not limited to, implementation of a firewall that is capable of detecting and blocking this type of traffic of unknown origin.
- g) High Usage Customers controls-this audit consists of verifying customers who show deviations in their consumption as to assess whether they may be involved in suspect fraudulent activity. If suspicion is high and the customer checks all the boxes for fraudulent activity, an entire investigation process begins until a satisfactory outcome is reached, which may end in prosecution of the client. This is considered an auxiliary control or measure applied by Tmcel.

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2. Commitment to response on requests from Industry Traceback Group

In the case of identification of robocalls originating from Tmcel/partners, the company commits to participate fully and respond to questions and queries regarding any suspect calls of this nature.

3. Cooperation in investigating suspect calls and Suspension/blocking

In the event of suspect robocalls originating from Tmcel/partners, the following steps are taken:

- a) Call monitoring is done continuously using Wireshark application that allows collecting trace data.
- b) b) After the detection of the calls and analyzed, once confirmed, calls are immediately blocked.
- c) c) The Customer/Partner is contacted and questioned regarding the fraudulent activities.

Approved by:



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