



Reliance Jio Infocomm Limited

Document Title: Robocall Mitigation Plan
Version: 2.0

This Robocall Mitigation Plan (“RMP”) describes the specific steps taken by Reliance Jio Infocomm Limited (“RJIL”) to avoid originating illegal robocall traffic.

Statement of Compliance

RJIL is committed to preventing its network from being used for unlawful and fraudulent purposes, including the origination of illegal robocalls. RJIL is classified as a foreign voice service provider. This designation places RJIL outside the jurisdiction of STIR/SHAKEN implementation obligations. RJIL certifies it has not been prohibited from filing in the Robocall Mitigation Database. Furthermore, RJIL certifies that it is not subject to an action or investigation by a commission, law enforcement, or regulatory agency due to suspected unlawful robocalling or spoofing. RJIL, as a foreign voice service provider, does not hold an Operating Company Number (OCN).

STIR/SHAKEN Implementation Obligation and Status

RJIL is a foreign voice service provider exempt from the STIR/SHAKEN implementation obligation as per 47 CFR Section 64.6304(b). All traffic originated by RJIL is originated using non-U.S.-based facilities. Moreover, all telephone numbers assigned to RJIL’s customers, and used in the caller ID field for U.S.-bound voice traffic, are allocated pursuant to non-U.S. numbering plans.

Traceback Cooperation

RJIL will respond within 24 hours to all traceback requests from the Federal Communications Commission (the “FCC”), law enforcement, and the Industry Traceback Group (the “ITG”) and it will cooperate with such entities in investigating and stopping any illegal robocalls originating on its network. RJIL will dedicate sufficient resources to provide timely and comprehensive responses to traceback requests. As detailed below, RJIL has identified a single point of contact to facilitate a timely response to any traceback request.

Subscriber Onboarding Process

Following the Mumbai terror attacks of 2008, the Indian Department of Telecommunications (“DoT”) has enacted a series of orders pertaining to subscriber verification that has resulted in India having some of the most stringent know-your-customer requirements in the world. The DoT has an aggressive audit process to identify non-compliance and levies substantial fines and penalties to violators. RJIL fully complies with the DoT’s subscriber verification requirements and has instituted a fully compliant “know-your-customer” program that ensures verification prior to commencement of service and allows for ongoing verification of each of its subscribers.

Ongoing Mitigation Efforts

RJIL has a NOC that is staffed 24/7. In order to prevent fraudulent and illegal activity, RJIL monitors voice traffic flowing through RJIL’s network in real-time utilizing state-of-the-art automatic and manual tools. RJIL also collects and maintains accurate call detail record (“CDR”) information that it will be able to access in responding to traceback requests. RJIL will promptly and diligently investigate any reported robocalls originating on its network and will take appropriate action (up to and including account suspension and termination) as authorized under our Terms of Service.

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RJIL has an anti-fraud management system in which it analyses customer and enterprise customer voice traffic patterns for suspicious surges in traffic volumes, such as:

1. High volumes of traffic from Enterprise customer during certain periods.
2. Continuous outbound dialling with minimal inbound traffic.
3. SIM Boxing

Designated Point of Contact

RJIL has designated the following individual for addressing traceback requests:

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