

Iridium Communications Inc.
Robocall Mitigation Plan

Amended: March 25, 2026

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I. Robocall Mitigation Plan Introduction

Consistent with the rules and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following Robocall Mitigation Plan details the policies and practices that Iridium Communications Inc. (“Iridium” or the “Company”), has established to prevent unlawful robocalls from originating on its voice network. In general, this Robocall Mitigation Plan provides information regarding Iridium’s:

1. Voice network being a highly improbable platform for illegal robocalls;
2. Equipment architecture that mitigates origination of illegal robocalls;
3. Robust contractual terms that prevent origination of illegal robocalls;
4. Monitoring and investigation of suspicious calling patterns; and
5. Commitment to cooperate in traceback requests.

A. Company Summary

Iridium is a world leader in providing mobile satellite voice and data communications services. Iridium’s primary address is 1676 International Drive Suite 1100, McLean, VA 22102. Iridium’s Affiliates, Subsidiaries, and Parent Companies with their FRNs, OCN, DBA names, or previous business names (if applicable) are identified in Exhibit A to this Robocall Mitigation Plan. Iridium’s Principals are identified in Exhibit B to this Robocall Mitigation Plan.

Iridium® is the world’s only mobile-satellite service (“MSS”) system with truly global, pole-to-pole coverage, providing a wide range of connectivity options with high network availability and redundancy. Iridium’s low-Earth orbit (“LEO”) cross-linked satellites also provide low end-to-end latency communications that are keenly important for reliable operations, including aviation and maritime safety services. The Iridium network provides critical communications when terrestrial connectivity has been disrupted on either a short- or long-term basis. Iridium is the only commercial satellite system providing capable of continuous global service to mobile users in all oceanic, remote, and polar regions.

Iridium’s network has been providing global service for more than two decades. In February 2019, Iridium completed the upgrade of its constellation with its second-generation Iridium satellites and supporting ground infrastructure. The network architecture has 66 operational LEO satellites in six orbital planes of eleven vehicles, with in-orbit spares and related ground infrastructure, as well as ground spares. These satellites support new services and higher data speeds for new products, providing end users with a significantly expanded platform of high-rate data services and applications, including Iridium Certus® broadband service.

Iridium’s highly reliable and secure communications are critical for a wide range of end users, from ship-to-shore calling and air-to-ground telephony and data communications to asset tracking and near real-time resource management. Iridium sells its products and services to customers through a distribution network of approximately 100 service providers, 300 value-added resellers (“VARs”), and 85 value-added manufacturers (“VAMs”). These service

providers, VARs, and VAMs then create and sell technology that integrates the Iridium network for use either directly by the end user or indirectly through another service provider, VAR, or VAM. As of December 31, 2023, Iridium had approximately 2,279,000 subscribers worldwide.

In limited instances, Iridium satisfies the FCC’s definition of a provider of “voice service.”¹ The vast majority of Iridium’s end user customers do not receive numbering resources from the North American Numbering Plan (“NANP”). A small percentage of Iridium’s end users may elect to request a NANP phone number from their Iridium Service Provider to which they may be able to forward incoming mobile phone calls. However, outgoing calls from the Iridium device display the non-NANP (Iridium 8816) phone number assigned to the subscriber.

B. Identification of STIR/SHAKEN Extension Category

Iridium is registered in the Robocall Mitigation Database as a “Voice Service Provider without a STIR/SHAKEN Obligation.” The FCC’s regulations define a provider of “voice service” as an entity that is interconnected with the public switched telephone network (“PSTN”) and that furnishes voice communications to an end user using resources from the North American Numbering Plan (“NANP”) or any successor to the North American Numbering Plan.² Further, a “small voice service provider” is defined as a “provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider’s affiliates).”³ The FCC has granted an indefinite STIR/SHAKEN implementation extension on the basis of undue hardship to small voice service providers that originate calls via satellite using NANP numbers in the caller-ID.⁴

Iridium furnishes such voice services to end users using resources from the NANP for fewer than 100,000 voice subscriber lines. Iridium therefore qualifies for an indefinite STIR/SHAKEN implementation extension but is also required to register in the FCC’s Robocall Mitigation Database, and to submit a Robocall Mitigation Plan.⁵

¹ 47 C.F.R. § 64.6300(g).

² *Id.* §64.6300(g).

³ *Id.* § 64.6304(a)(2).

⁴ *See Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18, ¶¶ 79-82 (2023) (“Call Authentication Sixth Report and Order”); The Commission has concluded that satellite providers originating calls using non-NANP numbers are not “voice service providers” within the meaning of the TRACED Act. The FCC also concluded that where satellite providers “utilize NANP resources for call forwarding to non-NANP numbers,” such calls also fall outside the scope of the TRACED Act. *Id.* ¶ 78. Finally, the FCC concluded that satellite providers subject to the extension must still submit a certification to the Robocall Mitigation Database. *Id.* ¶ 82.

⁵ Iridium understands that the Commission must reevaluate the extension annually and will update its Robocall Mitigation Plan as needed in response to any changes to FCC regulations. *See* 47 C.F.R. § 64.6304(f).

II. Robocall Mitigation Plan

A. Iridium's Voice Service is Economically Inhospitable to Illegal Robocallers.

The inherent design and functioning of Iridium's voice service makes it an economically inhospitable platform for use by illegal robocallers. As has been noted by Congress, the FCC and the Federal Trade Commission, illegal robocallers rely on voice service platforms that make it cheap and easy to originate millions of illegal robocalls on a daily basis.⁶ In its recent report to Congress under the TRACED Act, the FCC observed that "[d]eclining call costs over the past few decades have significantly lowered financial barriers to entry for would-be robocallers."⁷ The FCC further noted that whereas fifty years ago, domestic call rates were 25 to 50 cents per minute, wholesale rates to U.S. mobile phones today are less than a penny per minute.⁸ This in turn has created a "cottage industry" of certain types of voice providers specializing in so-called "dialer traffic" that is characterized by low cost, high-volume, short duration calls.⁹ Such characteristics are absent from satellite platforms providing voice service to end users.¹⁰

This dynamic creates an environment whereby any satellite voice service offering, including Iridium's, is economically inhospitable as a platform for generating such dialer traffic. As an example, publicly available information demonstrates that satellite voice services generally charge per minute rates that exceed the thresholds necessary to originate illegal robocall traffic.¹¹ As noted by one illegal robocall industry expert, low-cost calling offerings of less than a penny per minute create an environment whereby a VoIP provider originating one

⁶ See e.g., Federal Trade Commission, *Robocalls* (Sept. 2023), <https://consumer.ftc.gov/articles/robocalls>; see also Press Release, U.S. Senate Committee on Commerce, Science, & Transportation, *Thune Leads Commerce Committee Hearing Examining the Problem of Abusive Robocalls* (Apr. 18, 2018), <https://www.commerce.senate.gov/2018/4/thune-leads-commerce-committee-hearing-examining-the-problem-of-abusive-robocalls> (stating that "[a]s more phone systems move from copper wires to the internet, it has become easier and cheaper for bad actors to make illegal robocalls from anywhere in the world.").

⁷ See *FCC Report to Congress on Robocalls and Transmission of Misleading or Inaccurate Caller Identification Information*, at 14 (December 23, 2025), <https://docs.fcc.gov/public/attachments/DA-25-1100A1.pdf> ("FCC Report").

⁸ *Id.*

⁹ *Id.*

¹⁰ On December 16, 2025, the Commission released a Public Notice referencing its previous findings that "because satellite service costs make the high-volume calling necessary for robocallers uneconomical," there was "little evidence that satellite providers or their users are responsible for illegal robocalls," and the number of satellite subscribers using NANP resources was "miniscule." See *Wireline Competition Bureau Performs Required Evaluation of STIR/SHAKEN Implementation Extensions Pursuant to Section 64.6304(f) of the Commission's Rules*, WC Docket No. 17-97, Public Notice, DA 25-1058 (rel. Dec. 16, 2025) (internal quotes removed). As of the date of this filing, the Commission has not taken further action to change the status of the indefinite STIR/SHAKEN implementation extension for small satellite providers originating calls using NANP numbers.

¹¹ See Satellite Phone Store, Iridium Satellite Services – Voice & Data Plans, <https://satellitephonestore.com/service-plans/iridium-services> (last visited Mar. 25, 2026).

hundred million robocalls in a single month could expect to net approximately \$50,000 to \$100,000 in profit.¹²

Leveraging the same example, an illegal robocaller utilizing Iridium's platform to originate dialer traffic would incur expenses alone of approximately \$20 to \$33 million for the same volume of calls, even if the origination charges are billed in twenty second increments. As such, the economics of utilizing the Iridium voice platform for dialer traffic can reasonably be expected to significantly mitigate any risk that illegal robocalls will originate from the Iridium network.

B. Iridium's Handsets Do Not Support High-Volume Dialer Traffic.

Iridium handsets are not designed to support the origination of automated dialer traffic. Although Iridium devices provide access to reliable, robust, secure, uninterrupted call connectivity anywhere around the globe, their inherent design features are highly unfavorable for origination illegal robocalls. The standard operation of Iridium handsets requires manual keypad dialing and outdoor use to support phone calls. Alternatively, docking stations can be procured that support in-building use or in-vehicle use with an outdoor antenna and still require manual keypad dialing to support phone calls. Iridium handsets provide a connected interface via AT commands for remote dialing via docking stations. Although possible to create a program to automate the manual dialing of Iridium satellite handhelds from a PC, it is still economically inhospitable based on usage charges as outlined in section A. Furthermore, these interface specifications are only provided to Iridium Value Added Manufacturers under contract for the purposes of building docking stations that undergo certification from Iridium. Collectively, these inherent design features can reasonably be expected to significantly reduce the likelihood of illegal robocallers utilizing the Iridium network to generate illegal robocalls.

C. Iridium Phones Prevent Subscribers from Spoofing Caller-ID Information.

The FCC has consistently acknowledged that illegal caller ID spoofing is a critical component in the origination of illegal robocalls.¹³ However, this risk is significantly mitigated on the Iridium voice network since its customers cannot change or spoof their assigned caller ID information when calling from an Iridium device. Moreover, and as previously noted, only in limited instances can an Iridium end user be assigned a NANP telephone number. However, while customers can request a NANP telephone number from their Iridium Service Provider to which they may be able to *forward* incoming calls, outgoing calls will always display the unique non-NANP telephone number assigned to the end user. Depending on the Iridium service partner, customers are assigned either an eleven, twelve, or nineteen digit number. Given these

¹² See, Hearing, *Combatting Robocall Fraud: Using Telecom Advances and Law Enforcement to Stop Scammers and Protect Seniors*, United States Senate, Special Committee on Aging (July 17, 2019), Testimony of David Frankel, Telecommunications Consultant, at 3, https://www.aging.senate.gov/imo/media/doc/D60CDC96-5056-A066-605F-621146637069/SCA_Frankel_7_17_19.pdf.

¹³ See Call Authentication Sixth Report and Order ¶ 78 (stating that “[o]ne of the key aims of the TRACED Act, STIR/SHAKEN, and the Commission’s implementing rules, is to prevent call *spoofing*”) (emphasis added).

anti-spoofing capabilities on Iridium devices, their utility for use by illegal robocallers is significantly diminished.

D. Iridium has Robust Contractual Terms and Policies in Place to Mitigate Origination of Illegal Robocalls.

Iridium has also implemented robust contractual terms and policies that will mitigate the origination of illegal robocall traffic from its network. These terms and policies are generally enshrined in Iridium's: 1) standard contractual terms with its VARs; and 2) Supplier Standards of Conduct. With respect to the former, VARs that obtain services from Iridium are subject to contractual terms that can reasonably be expected to significantly reduce the origination of illegal robocalls.¹⁴ Iridium's contractual obligations with VARs generally include the following:

- ***Obligations to Suspend or Deactivate Voice Services Under Certain Circumstances.*** VARs are contractually obligated to notify Iridium "without delay" if any SIM cards have been lost, stolen, or have been misused in any way. In such instances VARs are also under an affirmative obligation to immediately suspend or deactivate the applicable Mobile Subscribers Integrated Services Digital Network ("MSISDN") number.
- ***Contractual Prohibitions Against Least Cost Routing.*** Iridium's standard contractual terms prohibit VARs from diverting voice traffic to avoid pricing differentials associated with provision of the service. These contractual prohibitions ensure that all voice traffic associated with the Iridium service are appropriately routed only through Iridium's voice network. In effect, Iridium's contractual terms expressly prohibit its VARs from enabling so-called "least cost routing", which is often used by illegal robocallers to avoid costly termination charges and to complicate traceback efforts.¹⁵ VARs are also under an affirmative obligation to cooperate with Iridium in the identification and prevention of least cost routing. Finally, Iridium's contractual terms further prohibit any activities that could potentially cause abnormal performance on the network, including call and/or network congestion.
- ***Contractual Obligations to Comply with All Federal and State Laws.*** Iridium's standard contract terms place an affirmative obligation on VARs to comply with all applicable United States federal and state laws, including any regulations and statutes pertaining to the mitigation of robocalls.

Iridium has also adopted a publicly available "Supplier Standards of Conduct" that applies to all Iridium "suppliers" which includes any third party wherever located that directly or indirectly sells, or offers to sell, any kind of goods or services to Iridium or on Iridium's behalf, including suppliers, contractors, subcontractors, distributors, dealers, sales/marketing representatives, intermediaries, agents, partners, consultants, resellers, systems integrators, or

¹⁴ *Call Authentication Trust Anchor*, WC Docket No. 17-97, Second Report and Order, 36 FCC Rcd 1859, ¶ 78 (October 1, 2020).

¹⁵ Complaint, *United States of America v. Nicholas Palumbo, et. al*, Civil Action No. CV 20-473, ¶¶ 21-23 (January 28, 2020).

similar entities.¹⁶ The intent of Iridium’s Supplier Standards of Conduct is to prevent any use or misuse of the Iridium network that: 1) negatively impacts the use of the Iridium network for other service partners or other Iridium subscribers; 2) negatively impacts the performance of the Iridium network; or 3) is illegal based on U.S. or local laws and regulations.

More specifically, the Supplier Standards of Conduct expressly requires its “suppliers to, at a minimum, conduct business and perform work in compliance with all laws and regulations applicable to their businesses” and to “comply with all terms, conditions, flow-down requirements and other provisions specified in their contracts, subcontracts, purchase orders or other agreements with Iridium.”¹⁷ Iridium retains the discretion to take responsive or corrective actions it deems appropriate in the event its services are used in way that violate the Supplier Standards of Conduct or Iridium’s contractual terms. These actions include, but are not limited to, the immediate suspension or termination of all or any portion of Iridium’s services or a device’s access to the Iridium network, suspension or termination of a service partner’s account, or termination of any underlying agreement. Collectively, Iridium’s Supplier Standards of Conduct and contractual terms with VARs can reasonably be expected to significantly reduce the origination of illegal robocalls.

Finally, with respect to the FCC’s ‘Know Your Upstream Provider’ obligations, Iridium operates with two to three Tier 1 upstream providers maximum at a given time to facilitate all voice traffic originating from or terminating to the Iridium network. The relationship between Iridium and its upstream providers involves strong contractual terms.

E. Iridium Monitors its Outbound Network Traffic.

Iridium’s Robocall Mitigation Plan also includes policies and procedures governing the analysis and monitoring of its outbound network traffic. Consistent with Principle #3 of the Attorneys General anti-robocall principles,¹⁸ Iridium monitors voice network traffic originating from its network to identify and monitor patterns consistent with illegal robocalls. As outlined below, Iridium has policies and procedures in place to analyze and monitor its network on a twenty-four-hour basis.

Iridium maintains a centralized Gateway Technical Operations (“GTO”) center staffed by appropriately trained full-time employees on a 24/7 basis. The GTO is the primary hub for managing the performance and status of the individual satellites in the Iridium network. Through this operations center, Iridium continuously directs and manages traffic routing through its network. GTO engineers monitor for and report any traffic for anomalies and outliers in voice traffic. This includes conducting daily traffic analysis, identifying and characterizing incidents, generating incident reports, and investigating suspicious network activity.

¹⁶ See Iridium, *Supplier Standards of Conduct*, <https://www.iridium.com/supplier-standards-conduct> (last visited Mar. 25, 2026).

¹⁷ *Id.*

¹⁸ State Attorneys General, *Anti-Robocall Principles*, at 2, <https://ustelecom.org/wp-content/uploads/2019/08/State-AGs-Providers-AntiRobocall-Principles-With-Signatories.pdf> (last visited Mar. 25, 2026).

F. Iridium is Committed to Participation in the Industry Traceback Group.

Although Iridium to its knowledge has never received a traceback request, it takes the issue of unwanted and illegal robocalls seriously and is committed to ensuring that its network is not utilized for the origination of such calls.¹⁹ Consistent with the FCC's rules and regulations, Iridium will respond promptly to all call traceback requests from the Commission, the Traceback Consortium, and law enforcement agencies within 24 hours. Iridium will also cooperate with all authorized entities to immediately identify and stop any illegal robocalls or any other calling abuse originating from its network.

Additionally, Iridium has not 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 the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient RMD certification or mitigation program description within the past 2 years.

In furtherance of this policy, the name, title, department, business address, telephone number, and email address of the person within Iridium responsible for addressing robocall mitigation-related issues, to include traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies, is as follows:

Contact Name: Kara Leibin Azocar
Contact Title: Vice President, Regulatory
Contact Address: 1676 International Drive Suite 1100
Contact City: McLean
Contact State and Zip Code: Virginia, 22102
Contact Telephone Number: (202) 230-4644
Contact Email: kara.azocar@iridium.com

* * * *

¹⁹ See *FCC Report*, Attachment A (listing participating and non-participating voice providers in tracebacks conducted by the Traceback Consortium in 2023 and 2024; Iridium is not identified as ever being sent a traceback request by the Industry Traceback Group).

Exhibit A – Company Information

Iridium’s Affiliates, Subsidiaries, and Parent Companies and their associated FRNs²⁰

Company Name	Category	FRN
Iridium Communications Inc.	Parent	N/A
Iridium Holdings LLC	Subsidiary	0018072926
Iridium Satellite LLC	Subsidiary	0004972790
Iridium Carrier Holdings LLC	Subsidiary	0018073007
Iridium Carrier Services LLC	Subsidiary	0007657075
Iridium Constellation LLC	Subsidiary	0007657059

²⁰ Iridium entities do not have OCNs or previous business names.

Exhibit B – Principals

As of the last updated date of this Robocall Mitigation Plan, Iridium’s principals and their titles are listed on the Iridium “Management” website which is updated when changes to the company’s leadership occur.²¹

²¹ See Iridium, *Management*, <https://investor.iridium.com/management> (last visited Mar. 25, 2026).