



Robocall Mitigation Plan

Company Name: Optical Telecommunications, Inc.

Company Address 1360 S Dixie Hwy, Suite 200, Coral Gables, FL 33146

Company Phone #: 305-779-7777

Pursuant to 47 C.F.R. § 64.6305, Optical Telecommunications, Inc. submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures Optical Telecommunications, Inc. has in place to mitigate illegal robocalls as of August 27, 2025. Optical Telecommunications, Inc. may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time in order to respond to changes in its business, its capabilities and its needs.

As of November 30, 2020, Optical Telecommunications, Inc. relies on Alianza, Inc. to process all calls originating from our customers. Alianza, Inc. controls the network infrastructure used to process all calls on our behalf. Alianza, Inc has a STIR/SHAKEN implementation and signs all calls originated by our customers:

- ☒ My traffic is fully attested.
- ☐ My traffic is partially attested.
- ☐ None of my traffic is attested yet

Optical Telecommunications, Inc. has enforceable terms of use and/or an acceptable use policies noted in its contracts. These policies define the circumstances by which the company will deny, suspend, or terminate service to a customer. Prior to installing services for new customers, the company takes the following measures to weed out end users that could potentially generate robocall traffic:

In accordance with 47 CFR 64.1200(n)(4) Optical Telecommunications, Inc. confirms the following information for its customers:

- Customer's identity
- Customer's right to use the telephone number presented on calls
- Service Address
- Credit History

When the customer is a business, Optical Telecommunications, Inc. also requires Business Incorporation Documents and verifies they have a reputation as a valid business that abides by the law.

Optical Telecommunications, Inc. relies on Alianza, Inc. to monitor its network and detect / prevent fraudulent activity. Alianza, Inc. has implemented a proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices. Through this fraud detection and mitigation process, Alianza, Inc. then notifies individual customers of potentially fraudulent activity occurring in any of that customer's subscriber accounts. Detailed information about this fraud detection and mitigation process is provided to each customer through Alianza, Inc.'s knowledge base and support resources. Alianza, Inc. may take remedial action against any subscriber's account to prevent or remediate robocalling or other fraudulent activity. If Alianza, Inc. takes any such action, its fraud detection system triggers notification to the customer of that action and any remedial steps that may be taken to restore service.

Optical Telecommunications, Inc. will comply fully with all conditions set forth in the FCC'S 2020 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Optical Telecommunications, Inc. has designated an individual as a dedicated point of contact for addressing traceback requests. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-rollback-group-itg/for-providers/>. Optical Telecommunications, Inc. will respond promptly to inquiries from the Industry Traceback Group (ITG).

If a pattern of questionable activity is detected Optical Telecommunications, Inc. will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated. Requests from the ITG must be submitted in writing and include the following information:

Company Name:
Company Address:
Requestor's Name:
Requestor's Title:
Requestor's phone number:
Requestor's e-mail:

Optical Telecommunications, Inc. will cooperate with state and federal regulators to prevent any and all illegal robocalls. Requests from the valid agency must be submitted in writing and include the following information:

Law Enforcement Agency Name:
Agency Address:
Requestor's Name:
Requestor's Title:
Requestor's phone number:
Requestor's e-mail:

Optical Telecommunications, Inc. will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities, and implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.