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Bondi Junction NSW 2022, Australia*

Robocall Mitigation Plan (“RMP”) for Delacon Pty Limited (“Delacon”)

Delacon is an Australian corporation in the SME (Small and Medium Enterprises) category, and a member of the Volaris corporate group.

Within the United States, Delacon is a reseller of inbound voice services supplied by Bandwidth, Inc. (“**Bandwidth**”). Delacon does not supply any voice services in the United States other than the Bandwidth inbound voice services that it resells. **Note: as at the date of this RMP, Delacon’s customer offering in the United States does not include outbound voice services.**

Delacon has been advised that its sole provider of voice services, Bandwidth:

- has been a long-standing active participant and leader in the key industry organizations and efforts to stop illegal robocalling; and
- deployed STIR/SHAKEN in its network in December 2019. Since then, Bandwidth has completed STIR/SHAKEN interops with Verizon Wireless, Comcast, T-Mobile/Sprint, AT&T, Peerless, and more.

Delacon shares Bandwidth’s belief that all consumers will benefit to the greatest degree when carriers and service providers can accurately identify illegal robocalls while simultaneously ensuring that valid communications are not improperly affected.

KEY ELEMENTS OF DELACON’S ROBOCALL MITIGATION PLAN

I. PREVENTION

Delacon thoroughly screens its prospective customers at the on-boarding stage in order to prevent persons or entities that may engage in illegal robocalling from accessing Delacon’s services. Our standard “Know Your Customer” screening processes include identity verification for individual applicants, searches of corporation registries for corporate applicants, and requirements for trade and bank references.

Delacon carefully reviews the regular communications received from its voice service provider and will:

- monitor for behaviors that may signal or constitute unlawful robocalling; and
- take all necessary steps to prevent illegal robocalling behaviors on its networks (including working diligently with its supplier and customers to stop any unlawful robocall campaigns that are detected).

Additionally, Delacon’s standard terms and conditions of service specify that our customers must not use, and must use all reasonable endeavours to ensure that others within their control do not use. Delacon’s services for any purpose that is defamatory, offensive, abusive, obscene, menacing, threatening, harassing, or illegal, or for any (other) unlawful purpose.

In our view, illegal robocalling fraud and abuse is covered by these restrictions.

II. RESPONSE

Delacon will respond fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

III. OTHER TECHNICAL AND OPERATIONAL MEASURES

The principal technical and operational measures comprised in Delacon's Robocall Mitigation Plan are based on the procedures adopted by our voice service provider, which are stated by Bandwidth to incorporate industry best practices and have been described elsewhere in the Robocall Mitigation Database, as follows:

- 1) **Monitoring and detection:** Bandwidth has a team of operational experts who have implemented technical and operational processes and procedures to monitor, detect and analyze the use of its services and traffic on our network that helps to determine when illegal and inappropriate robocalling activity may be occurring. Bandwidth has developed and deployed a "Call Blocking Tool" that incorporates industry best practices into its core network to identify and block invalid, unallocated and otherwise obviously illegal telephone numbers. Further, Bandwidth implemented STIR/SHAKEN in its all-IP core network infrastructure before it was mandated by the FCC and has been working to increase call detail transparency and collaborative traceback enablement for years. When unlawful robocall campaigns are detected, Bandwidth follows established processes and procedures to notify upstream customers of the problematic traffic and request that they take immediate corrective actions to prevent reoccurrence of the illegal calls.
- 2) **Mitigation:** Bandwidth's operations personnel are positioned to rapidly assist the ITG with the industry's collective efforts to identify the originating sources of illegal activities on the PSTN and prevent further delivery of unwanted and illegal traffic to the greatest degree possible. Bandwidth tracks its ITG request data and conducts considerable outreach to upstream customers that have sent traceback traffic to Bandwidth. Bandwidth's upstream provider mitigation efforts aim to achieve demonstrable improvements in call quality, while also accounting for call quantities that are being serviced. Bandwidth's commitment to the benefits of STIR/SHAKEN in an all-IP network environment advances improvements in accurate and targeted call blocking that are designed to block calls from invalid and illegal telephone numbers in keeping with industry best practices and the FCC's recommendations. Bandwidth also works closely with Law Enforcement Agencies (LEA) at all levels of government and with its interconnected carrier partners. Bandwidth aims to work diligently with its customers and other industry members to stop unlawful robocall campaigns. Together with its active involvement in the ITG, Bandwidth supports the industry's established Do Not Originate (DNO) efforts pursuant to the industry best practices and procedures.

SUMMARY

- (a) All calls passing through Delacon's network in the United States are transmitted to that network from Bandwidth's network.
- (b) Bandwidth has confirmed to the FCC that it has completed STIR/SHAKEN Implementation.
- (c) Based on the information made publicly available by Bandwidth, caller identification information for

calls received on Delacon's network in the United States will be authenticated prior to passing from the Bandwidth network to Delacon's network.

- (d) As at the date of this RMP, Delacon's customer offering in the United States does not include outbound voice services (customers may only purchase inbound services from Delacon).

AFFILIATED ENTITIES COVERED BY DELACON'S ROBOCALLING MITIGATION PLAN

Currently Delacon is the sole supplier of "Delacon" branded telephony services within the United States and no affiliate entity of Delacon is involved in the provision of such services in this jurisdiction. Therefore, as at the date of this RMP, no additional entities are incorporated into Delacon's plan.

REVIEW

Delacon reviews this Robocall Mitigation Plan at least annually and will update it as necessary to meet the requirements of applicable laws.

26 February 2024