

# **Robocall Mitigation Plan**

## STIR/SHAKEN

### **June 10, 2021**

NG Communications BV ("**NGC**") is committed to fight fraudulent voice traffic, especially from illegal robocalls. As part of NGC's submission to the Robocall Mitigation Database, this document describes

- NGC's commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the Consortium, and to cooperate with such entities in investigating and stopping any illegal robocalls
- NGC's policies to screen new customers
- NGC's enforced contractual terms which aim to prevent the use of NGC's services for any fraudulent or unlawful purposes
- NGC's technical controls to detect and block fraudulent traffic, including illegal robocalls

As a small telecommunications provider, specializing in voice and fax applications, with less than 100,000 voice subscribers, NGC is eligible for the STIR/SHAKEN implementation extension received under 47 CFR § 64.6304. We are actively developing our implementation for the purpose of self-signing certificates.

## Collaboration with the Commission and authorities

NGC is committed to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and to cooperating with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

NGC's Regulatory Compliance team have been briefed on the traceback and obligations. NGC maintains current and correct information about its customers so that it can provide accurate responses to traceback requests.

## Screening new customers

NGC implements a rigorous "know your customer" process, designed to adhere to all relevant legal requirements and to prevent customers from using our network to originate illegal calls. NGC strictly offers services to business customers, who are required to submit proof of registration and location.



## **General terms and conditions**

NGC's contractual terms allow it to enforce actions against customers that generate illegal or fraudulent traffic. NGC's current general terms and conditions prohibit the use of NGC's services for any fraudulent or unlawful purposes. If NGC reasonably suspects that any of its services is being used for fraudulent or unlawful purposes, NGC reserves the right to suspend or terminate such service. NGC does not and will not hesitate to enforce such contractual terms.

## **Controls on traffic**

NGC has its own fraud management system to automatically detect voice frauds via Call Detail Records (CDRs) analysis. The Regulatory Compliance team takes all the necessary measures to block fraudulent traffic including illegitimate robocalls, spams calls and calls with spoofed CLI. NGC is permanently investing to improve its fraud-detection capabilities and the time to react to be near real time.