

LAST MILE CORP. STIR/SHAKEN IMPLEMENTATION & ROBOCALL MITIGATION PLAN (RMP)

Established in 2007, Last Mile Corp. (“Last Mile”) is a boutique provider of International switched voice services to the worlds’ most important telecommunication operators and VoIP retail service providers. Last Mile’s customers and suppliers include, Fixed-Line operators, Mobile Network Operators, Retail Enterprise companies along with VoIP service providers. Our core operations are highly focused between Asia, Africa, LATAM, Middle East, the Caribbean and of course, the United States.

Last Mile is positioned extremely well with a strong suite of product offerings, excellent partnerships, financial strength, and an impressive growth rate despite the industry trends. We look forward to the challenges that the future holds and we look to capitalize on the opportunities that will surely unfold as the industry continues to evolve.

It serves to note that Last Mile does not originate or terminate any voice calls and has no voice end users, instead it serves as an *Intermediate Provider* for other wholesale carriers. At times, for certain foreign originated calls destined for the US, Last Mile is a *Gateway Provider* as described by the Commission and it files this Plan in that capacity.

Last Mile Corp. is hereby submitting this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls, as of January 2024, as required by the FCC. The Plan describes the actions and policies Last Mile implements with respect to foreign-originated robocalls carrying a U.S. number in the caller ID field. These actions are consistent with the Commission’s requirements for Gateway Providers. These practices are designed to prevent, as much as reasonably possible, the transit of illegal robocalls destined for the US.

STIR/SHAKEN

Last Mile has implemented technical procedures to pass unaltered any identity header it receives with calls using Session Initiation Protocol (SIP) on the IP portions of its network to terminating voice service providers or subsequent intermediate providers in the call path. Additionally, Last Mile holds a service provider code (SPC) token granted by the Secure Telephone Identity Policy Administrator (STI-PA) and a certificate from a Secure Telephone Identity Certification Authority (STI-CA) and will authenticate and verify any unsigned calls it receives in a manner consistent with the standards developed under the STIR/SHAKEN framework.

TRACEBACK REPORTS

Last Mile will respond to all traceback requests it receives from the FCC, law enforcement, or the ITG regarding calls for which it acts as an intermediate provider. For this, Last Mile has a dedicated

point of contact for addressing traceback requests and commits to respond any traceback request within 24 hours of receiving it.

Last Mile will periodically review records of traceback requests to identify customers that are the subject of a pattern of traceback inquiries. Last Mile will determine an appropriate action to take on a case-specific basis, which may include directing the customer to remedy the problem and, if effective action is not taken, temporary suspension of the customer and/or termination of the customer's service.

Last Mile commits to cooperate in investigating and stopping any identified illegal robocallers that use Last Mile US gateways to carry or process calls.

CUSTOMER DUE DILIGENCE

- Last Mile conducts a comprehensive due diligence and credit review before establishing a contractual relationship with carrier customers. This includes a thorough research on the prospective carrier's industry reputation and the required completion of "Know Your Customer" form.
- Last Mile contracts establish a reciprocal general obligation between Last Mile and its carrier customers to not use the services for any unlawful purpose, to prevent fraudulent uses, and to cooperate with each other to avoid these unlawful activities.
- Last Mile will terminate or suspend service to customers with a history of non-compliance with its contractual obligations, including provisions relating to acceptable use of the service.

OTHER INTERNAL POLICIES

- Last Mile will block traffic that appears to be illegal or is flagged as suspicious under its fraud policy. Last Mile will make a good faith effort to identify substantially similar traffic considering common indicia of illegal calls such as call duration, call completion ratios, large bursts of calls in a short time frame, neighbor spoofing patterns and sequential dialing patterns.
- Last Mile implements network wide blocking of incoming traffic based upon the USTelecom "Do Not Originate" list.
- Last Mile also implements several manual resource efforts to evaluate the legitimacy of incoming voice communications.

Last Mile will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should it determine that changes are appropriate, its practices may differ from those described on this document.