

Telefónica Germany GmbH & Co. OHG (“Telefónica Germany”) Robocall Mitigation Plan

The target of this document is to describe activities and actions of Telefónica Germany to detect and mitigate robocalls generated in or passed through its network.

Telefónica Germany does not generate calls with an A-Numbers belonging to the North American Numbering Plan (NANP) in its usual cause of business. Only in case of roaming North American Subscribers NANP numbers can appear as originated in our network. Also Calls with an A-Number passed through Telefonica Germanys network.

Fraud and Robocall Mitigation Activities

Telefónica Germany is permanently monitoring all the traffic generated in and passed through its network to detect and mitigate fraudulent or unlawful activities. A variety of systems and processes are deployed to counter fight telecommunication fraud using leading edge technologies. This includes cooperation on national and international level with partners and authorities as well as sharing relevant information regarding fraudulent traffic streams with other peers. STIR/SHAKEN is not implemented.

Monitoring activities for abnormal traffic patterns which can also detect robocalls include (but are not limited to):

- Search for burst traffic
- Variety of target numbers (B-party)
- Base station location
- Volumes of traffic within timeframes

Blocking of suspect SIM cards is performed in direct cooperation with the issuing network operator / provider via roaming department.

Telefónica Germany fully supports fraud prevention activities and will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. Telefónica Germany will cooperate with such entities in investigating and stopping any illegal robocalling activities that use its services to originate calls. In case of trace back actions Telefónica Germany is limited to the following restrictions:

- Restrictions due to applicable laws and regulation
- Tracebacks and disclosure of call detail records are subject to requests by German national regulatory authority (Bundesnetzagentur, BNetzA) or German national police
- Storage period for traffic data is legally prescribed and limited in Germany
- Existing NDA between interconnection partners involved in particular relevant call scenario

All requests have to be addressed to department “Special Services” at Telefónica Germany.