



Robocall Mitigation Plan

Company Name: TalkAsiaVOIP LLC

Company Address 364 E. Main St. Suite 1011 Middletown, DE 19709

Company Phone #: 302-261-5199

The Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act) requires voice service providers to implement STIR/SHAKEN authentication on Session Initiation Protocol ("SIP") traffic on carrier networks as well as to implement a Robocall Mitigation Plan ("RMP") covering non-SIP Time Division Multiplexing ("TDM") traffic.

TalkAsiaVOIP LLC operates as a provider of "voice service" as set forth in Section 64.6300(I) of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. §64.6300(I). TalkAsiaVOIP LLC has a mix of TDM and SIP traffic on its network. TalkAsiaVOIP, LLC authenticates SIP voice traffic originating on its network under the STIR/SHAKEN authentication framework, pursuant to 47 CFR § 64.6301(a).

The Commission grants TalkAsiaVOIP LLC a continuing extension for implementing STIR/SHAKEN authentication for TDM traffic provided TalkAsiaVOIP LLC comply with Commission rules applicable to such portions of the TalkAsiaVOIP LLC network subject to extension. To this end, TalkAsiaVOIP LLC hereby submits this RMP to the Robocall Mitigation Database describing and confirming practices, policies, and procedures to mitigate unlawful robocalling, which include the following:

- (1) TalkAsiaVOIP LLC's specific reasonable steps to avoid originating illegal robocall traffic as part of this RMP;
- (2) TalkAsiaVOIP LLC's commitment to respond within 24h to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers using TalkAsiaVOIP LLC's service to originate calls; and,
- (3) TalkAsiaVOIP LLC's intent to participate in industry tradeshows, groups, or consortiums, working to strengthen efforts to combat unlawful robocalling, and additional call verification and authentication solutions.

EFFORTS TO AVOID ORIGINATING ILLEGAL ROBOCALLS AS PART OF THE RMP

TalkAsiaVOIP LLC offers a digital, cloud-based, high-performance network SIP solution for customers.

TalkAsiaVOIP LLC's meaningful investments in the digital network includes software technology, equipment and resources to combat illegal robocalls as part of this RMP consistent the most rigorous regulatory and compliance requirements.

As part of TalkAsiaVOIP LLC's RMP, TalkAsiaVOIP LLC provides the following affirmative, effective measures to help minimize the impact of illegal or unwanted robocalls, and prevent new and renewing customers from using TalkAsiaVOIP LLC to originate illegal calls:

• Customer Vetting

TalkAsiaVOIP LLC maintains a comprehensive customer vetting process to meet "Know Your Customer" ("KYC") obligations. This KYC vetting process provides an understanding of the nature of activities for any new and existing customers. Prior to installing services for new customers, in an effort to weed out end users that could potentially generate robocall traffic, TalkAsiaVOIP LLC confirms the following information:

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

When dealing with a business end user customer, TalkAsiaVOIP LLC also requires business organizational/incorporation documents. Moreover, TalkAsiaVOIP LLC conducts reputational verification in addition confirming the validity of customer business compliance with the law. Identifying and understanding customers through this KYC vetting process diminishes the opportunity to use TalkAsiaVOIP LLC's network for spoofed or illegal traffic.

• Customer Contracts/General Terms and Conditions.

TalkAsiaVOIP LLC

maintains enforceable terms of use within end user customer contracts. The terms and conditions define the circumstances by which TalkAsiaVOIP LLC will deny, suspend, or terminate service to a customer. TalkAsiaVOIP LLC prohibits customers from originating fraudulent calling using any fraudulent means, devices, or technologies. TalkAsiaVOIP LLC's end user customer Terms and Conditions permit TalkAsiaVOIP LLC, without notice, to discontinue, block or suspend services if necessary to prevent fraud, scams, tampering, schemes, false or invalid numbers. As stated further below, TalkAsiaVOIP LLC shall block or suspend the service of any customers originating unlawful robocalls through TalkAsiaVOIP LLC. TalkAsiaVOIP LLC's RMP includes an increasing investment in resources over time to further strengthen adherence to compliance to all such requirements by customers.

• Acceptable Use Policy.

In addition to Terms and Conditions of contract,

TalkAsiaVOIP LLC also obligates end user customers through the Acceptable Use Policy ("AUP"). The AUP prohibits customers from utilizing the service for any illegal, fraudulent, objectionable and/or unauthorized manner, reserving

the sole and absolute right to deny, restrict or immediately suspend or terminate service if the use of the service by the customer, or anyone having access to or using the service, either violates the AUP or includes unlawful conduct.

- **Automatic Number Identification Management:** TalkAsiaVOIP LLC shall block originating telephone numbers if identified based upon patterns of activity.
- **Proactive Blocking.** TalkAsiaVOIP LLC requests underlying carriers to block calls from phone numbers on Do-Not-Originate lists published by US Telecom and Neustar.
- **Underlying Network Provider.** TalkAsiaVOIP LLC works with underlying providers and supports the benefit of deploying systems to detect potential robocall activity relying upon statistics such as average call duration, ASR, and call count carrier/consumer reports.
- **Traffic Reports and Industry Information.** TalkAsiaVOIP LLC has established methods and procedures to monitor its network and detect / prevent fraudulent activity. TalkAsiaVOIP LLC uses call authentication, call labeling, and call blocking services to protect its networks and consumers from harmful calls. As stated above, TalkAsiaVOIP LLC also uses software to monitor its network's daily usage and has established methods and procedures in place to address issues immediately once identified. Reports generated by Call Detail Record and pattern trends, fraud information sharing through industry organizations, and third-party notifications and complaints, may identify potential unlawful robocalling. Although no evidence exists suggesting TalkAsiaVOIP LLC in any way originates illegal robocall campaigns, in any instance where unlawful calling is identified, TalkAsiaVOIP LLC maintains contractual ability to take any action it deems necessary to eliminate the fraudulent activity.

ONGOING COMPLIANCE

TalkAsiaVOIP LLC will continue to fully comply with all conditions set forth in the Commission's Orders mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Should TalkAsiaVOIP LLC detect a pattern of questionable activity, TalkAsiaVOIP LLC 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 Industry Traceback Group (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:

TalkAsiaVOIP LLC 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:

TalkAsiaVOIP LLC 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.

COMPANY INFORMATION AND POINT OF CONTACT

TalkAsiaVOIP LLC designates the following individual as a dedicated point of contact for addressing traceback requests:

Name:	Mohsin Shahzad Khaliq
Title:	President
Department:	Executive
Business Address:	364 E Main Street, Suite 1011, Middletown DE 19709
Telephone Number:	(302) 261-5199
Email Address:	sales@talkasiavoip.com

TalkAsiaVOIP LLC provided ITG with the contact information and business hours for those individuals. See <https://www.ustelecom.org/the-industry-traceback-group-itg/providers/>. TalkAsiaVOIP LLC will respond promptly to inquiries from the Industry ITG.

CERTIFICATION

I, Mohsin Shahzad Khaliq, President of TalkAsiaVoIP, LLC, do hereby certify, under penalty of perjury, the following:

a. TalkAsiaVoIP, LLC fully implemented STIR/SHAKEN requirements in IP portions of its network. TalkAsiaVoIP, LLC lacks control over the necessary infrastructure for non-IP network.

b. TalkAsiaVoIP, LLC business name and primary address follows:

TalkAsiaVoIP, LLC
364 E Main Street, Suite 1011
Middletown, DE 19709

c. Entities owning 10% or more of TalkAsiaVoIP, LLC include: none. TalkAsiaVoIP, LLC has no subsidiaries or affiliates.

d. TalkAsiaVoIP, LLC has had no licenses revoked by the Commission and has not been subject to enforcement action by the Commission.

e. TalkAsiaVoIP, LLC does not operate under any other business name.

f. TalkAsiaVoIP, LLC has not previously used or operated under any other business name.

g. The name, title, department, business address, telephone number and email address of the individual responsible for addressing robocall-related issues for the Robocall Mitigation Plan follows:

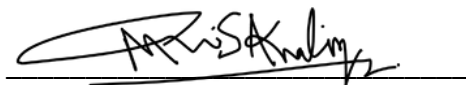
Name: Mohsin Shahzad Khaliq
Title: President
Department: Executive
Business Address: 364 E Main Street, Suite 1011, Middletown DE 19709
Telephone Number: (302) 261-5199
Email Address: sales@talkasiavoip.com

h. TalkAsiaVoIP, LLC's role in the call chain is that of a voice service provider without a STIR/SHAKEN implementation obligation to serve end users.

i. TalkAsiaVoIP, LLC has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

j. TalkAsiaVoIP, LLC is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

k. TalkAsiaVoIP, LLC OCN is 198k.



Mohsin Shahzad Khaliq