



AURORA TRADE LLC

Robocall Mitigation Policy

The Federal Communications Commission (FCC) has issued certain rules requiring that communications providers to implement call authentication framework and other robocall mitigation practices in combination with anti-Spoofing rules collectively known as STIR/SHAKEN. See, 47 C.F.R. § 64.6301 et. seq, and 47 C.F.R. § 64.6305 et. Aurora Trade LLC is an intermediate provider according to definition of FCC rule 47 CFR § 64.1600 and a reseller.

On STIR/SHAKEN implementation requirement FCC has indicated that it does not apply to providers that lack control of the network infrastructure necessary to implement the framework, so intermediate providers such as Aurora Trade LLC do not have any implementation obligations themselves.

The reason for this is because an intermediary provider may not have a direct relationship with the reseller subscribers or might not be positioned to provide a superior level of assurance that these calls are reliable in all occurrences.

However, the robocall mitigation program requirements apply to all intermediate providers regardless of their STIR/SHAKEN obligations.

As an intermediary voice service provider and international wholesaler, Aurora Trade LLC does not transmit, generate or originate calls from within its network to any USA call destination. Aurora Trade LLC operates solely as an intermediate wholesale provider. Aurora does not originate voice traffic, assign telephone numbers, or serve retail end users. Aurora carries U.S.-originated traffic received from originating U.S. voice service providers solely for delivery to international destinations. Aurora does not terminate voice traffic to U.S. destinations.

Aurora Trade LLC is fully committed to stopping illegal robocalls from originating on its network and undertaking reasonable efforts to monitor the calls coming into its network, consistent with FCC regulations guidance.

Know Your Customer

Aurora Trade LLC has established and implemented comprehensive Know Your Customer policies for any new and existing customers. The objective of the Know your customer policy is to prevent Aurora Trade LLC from being an intermediate gateway, intentionally or unintentionally, for spoofed or illegal traffic.

Traceback Cooperation

Aurora Trade LLC commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium.

Ongoing Mitigation Plan

Our NOC works 24x7 monitoring traffic using different tools in order to identify patterns that are consistent with robocalls. This information can assist in the traceback process to identify the source of illegal calls. Once the company identifies potential fraudulent, suspicious or, robocalling traffic, we block it so it can be rejected, we blacklist the origination number and issue a report to the customer notifying that the route is being fully blocked as a preventive measure and it will be re-opened once he confirms that the customer was removed. Once we have this confirmation, the customer is re-opened with the minimum capacity so that we can keep a strict audit of this traffic.

Aurora retains call detail records sufficient to support traceback investigations for a commercially reasonable period consistent with industry standards. Aurora does not remove or alter STIR/SHAKEN Identity headers received from upstream originating providers except as technically required for international routing.