

August 17, 2021

Federal Communications Commission
Washington, D.C. 20554

RE : Robocall Mitigation Plan for Sogetel Inc. (FRN #0031268253)

The purpose of this letter is to submit Sogetel Inc. ("**Sogetel**") Robocall Mitigation Plan to the Federal Communications Commission (the "**Commission**") in relation to Sogetel's registration with the Commission's Robocall Mitigation Database.

The following is a list of measures taken by Sogetel to avoid originating robocall traffic :

- Sogetel has implemented universal network-level call blocking where the caller identification number does not have a format conforming to established numbering plans, pursuant to the Canadian Radio-television and Telecommunications Commission ("**CRTC**") Compliance and Enforcement and Telecom Regulatory Policy 2018-484.
- Sogetel is a member of the Canadian Secure Token - Governance Authority (CST-GA);
- Sogetel is working to implement STIR/SHAKEN standards to authenticate and verify caller identification information for Internet Protocol ("**IP**")-based voice calls, pursuant to the CRTC Compliance and Enforcement and Telecom Decision 2021-123.
- For the vast majority of Sogetel subscribers, including those using VoIP, calling number and name are set by Sogetel's switch according to customer billing information with no way for overriding by subscriber.
- Sogetel's contract terms of service and General Tariff contain provisions prohibiting customers from using or allowing the services to be used in contravention with the law or to make unwanted or offensive calls. Customers are also prohibited from using the services in a manner that limits or prevents another user from adequately using Sogetel's services or receiving or transmitting information. Sogetel may suspend or terminate the services if the customer is in default of such provisions.
- Sogetel is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using its service to originate calls.

Yours truly,

Dominic Germain,
Internet services and switching director

End of document