



Borderless Communications has implemented STIR/SHAKEN across its voice network. In addition, our upstream and intermediate VoIP service providers have implemented STIR/SHAKEN and apply signing and verification to both inbound and outbound call traffic where supported.

Borderless Communications maintains policies and procedures designed to mitigate illegal robocalls and other forms of unlawful traffic on our network. These include:

- **Traceback Cooperation:**
Borderless Communications responds to all traceback requests from the Industry Traceback Group (ITG), law enforcement, and state and federal regulators in a timely manner.
- **Know Your Customer (KYC) Program:**
We verify customer identity and business legitimacy prior to service activation. This includes validation of business information, intended use of services, physical location, and primary contacts.
- **Acceptable Use Enforcement:**
Customers are required to agree that services will not be used for illegal activities, including unlawful robocalling, telemarketing violations, nuisance calling, or fraud schemes such as Wangiri.
- **Traffic Monitoring and Alerting:**
We receive and review alerts related to suspicious traffic patterns from upstream providers and monitor for anomalies within our network.
- **Mitigation and Enforcement Actions:**
Borderless Communications has the ability to trace, investigate, and take corrective action on traffic originating from our network, including suspension or termination of services when necessary.
- **Call Blocking Capabilities:**
We provide call-blocking capabilities and support for mitigating unwanted or suspicious traffic originating from or terminating to the PSTN.

These measures are designed to reduce the risk of illegal traffic on our network and ensure compliance with FCC requirements related to robocall mitigation.

Thank you,

Steven Scott
President
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