

Updated April 2025

Speedcast Robocall Mitigation Plan

Speedcast Americas, Inc (“Speedcast”) is an international remote communications and information technology services provider focused on delivering solutions through a multi-access technology, multiband, and multi-orbit network utilizing communications capacity acquired from more than 80 satellites and an interconnecting global terrestrial network, bolstered by extensive on-the-ground local support in more than 40 countries. The company provides managed information services with differentiated technology offerings, including cybersecurity, crew welfare, content solutions, data and voice applications, Internet of Things solutions, and network systems integration services. Speedcast’s primary customers are in the cruise, energy, enterprise, and commercial maritime businesses.

Speedcast’s Affiliates and Subsidiaries in the USA (with previous business names where relevant) are identified in Exhibit A to this Robocall Mitigation Plan. Speedcast’s Principals are identified in Exhibit B to this Robocall Mitigation Plan. Speedcast and its Subsidiaries’ FRNs, where applicable, are listed in Exhibit C. Speedcast has no known OCNs.

While the nature of Speedcast’s managed services and satellite transmissions make use of Speedcast’s ecosystem for robocalling unlikely, the company submits the below robocall mitigation plan.

Identification of STIR/SHAKEN Extension Category

Speedcast’s role in the call chain is that of a voice service provider. The FCC’s regulations define a provider of “voice service” as an entity that is interconnected with the public switched telephone network (“PSTN”) and that furnishes voice communications to an end user using resources from the North American Numbering Plan (“NANP”) or any successor to the North American Numbering Plan.¹ Further, a “small voice service provider” is defined as a “provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all of the provider’s affiliates).”² The FCC has granted an indefinite STIR/SHAKEN implementation extension on the basis of undue hardship to small voice service providers that originate calls via satellite using NANP numbers.³

Speedcast is a small voice service provider that originates calls via satellite using NANP numbers. Speedcast therefore qualifies for an indefinite STIR/SHAKEN implementation extension but is also required to register in the FCC’s Robocall Mitigation Database, and to submit a Robocall Mitigation Plan.

Know Your Customer Protocols

¹ 47 CFR §64.6300(o).

² CFR § 64.6304(a)(2).

³ See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18, ¶¶ 79-82 (2023) (“Call Authentication Sixth Report and Order”). The FCC has concluded that satellite providers originating calls using non-NANP numbers are not “voice service providers” within the meaning of the TRACED Act. The FCC also concluded that where satellite providers “utilize NANP resources for call forwarding to non-NANP numbers,” such calls also fall outside the scope of the TRACED Act. *Id.* ¶ 78. Finally, the FCC concluded that satellite providers subject to the extension must still submit a certification to the Robocall Mitigation Database. *Id.* ¶ 82.

As part of the onboarding process, Speedcast signs a contract with a customer and confirms that company's identity. The information Speedcast generally collects includes, but is not limited to, the following information:

- physical business location,
- contact person in the customer's business,
- credit report, and
- nature of customer's business.

Speedcast contracts generally require customers to comply with the law and include a right for Speedcast to cancel the contract if the customer does not cure a breach.

Know Your Upstream Provider

With respect to the FCC's 'Know Your Upstream Provider' obligations, Speedcast operates with various upstream providers to facilitate all voice traffic originating from or terminating to the Speedcast network. The relationship between Speedcast and its upstream providers involves strong contractual terms, and includes close coordination on robocall mitigation and investigation.

Speedcast Does Not Act as a Transit Provider

Speedcast does not act as a transit provider for wholesale carriers. As a result, Speedcast's configuration eliminates the risk that unlawful robocall traffic from other voice providers will transit Speedcast's ecosystem and terminate on the PSTN.

Speedcast Coordinates with its Suppliers

U.S. telephone numbers provided to Speedcast end users generally are supplied through U.S. carriers that comply with STIR/SHAKEN requirements. The telephone number assigned to the end user is listed as the outbound number on all outbound calls and such calls are routed back through the carrier that supplied the telephone number. Speedcast does not allow its U.S. end users to spoof the origination telephone number, and Speedcast provides information about the end user to the supplying carrier for inclusion in its STIR/SHAKEN database. All inbound calls to the end user assigned telephone numbers are routed through the supplying carrier.

Speedcast Monitors its Network & Investigates Suspicious Traffic

Speedcast's suppliers generally monitor voice traffic over their networks to identify patterns consistent with suspected illegal robocalls. Potential issues are flagged to Speedcast, which will work with those suppliers to trace and investigate suspected illegal robocalls.

Speedcast's general ecosystem also includes the following functionality:

- *Fraud protection.* Detection of fraudulent dialing patterns, such as multiple call attempts and multiple simultaneous origination.
- *Credit Limit.* Ability to keep daily limits on call use, set to a customer's regular dialing patterns.
- *IP / CLI validation.* Ability to limit the origination or authorization of a call to an IP address or CLI or combination of both.

Any alarms generated for a breach of these services are monitored 24/7 by a third party who will investigate or escalate to Speedcast as necessary.

Call Analytics Systems

Speedcast utilizes its own internal resources, systems, and frameworks to analyze its network for suspicious robocall traffic. This is supplemented with reports from our partners.

Speedcast Will Respond to Traceback Requests

Speedcast takes the issue of unwanted and illegal robocalls seriously and is committed to ensuring that its network is not utilized for the origination of such calls. Speedcast will therefore respond within 24 hours to all traceback requests from the Commission, the Traceback Consortium, and law enforcement agencies, consistent with the FCC's rules and regulations.

In furtherance of this policy, Speedcast provides the following information for its designated individual responsible for responding to traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies. This information, which includes the name and contact information, is as follows:

Contact Name: Joseph Chao
Contact Title: Director, Commercial Contracts
Contact Address: 4400 S. Sam Houston Parkway East
City: Houston
Contact State and Zip Code: Texas 77048
Contact Telephone Number: (832) 668-2439
Contact Email: tracebackrequests@speedcast.com

Certifications

Filing in the Robocalling Mitigation Database

Speedcast certifies that its prior certification filed in the Robocall Mitigation Database ("RMD") has not been removed by FCC action, nor has it been prohibited from filing in the RMD pursuant to a law enforcement action.

Enforcement Actions and Investigations

Neither Speedcast nor any entity with which Speedcast shares common ownership, management, directors, or control, has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to Speedcast transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description in the prior two years.

Exhibit A – Company Information
Speedcast’s USA Subsidiaries

Ultimate Parent & All US Subsidiaries/ Affiliates:

US Entities	Company number
Speedcast Holdings LLC (Ultimate Parent)	4874959
Speedcast Americas, Inc	5621955
Ultisat, Inc	3612130
CCI Services Corp.	4267068
Maritime Communication Services, Inc.	911217
SpaceLink Systems, LLC	4894171
Speedcast LATAM Inc. (fka Newcom International, Inc.)	P00000066752
SpaceLink Systems II, LLC (fka SpackLink Systems, Inc.)	802608441
Speedcast Communications Inc (fka Harris Caprock Communications, Inc. <-- CapRock Communications Inc <-- IWL Communications Incorporated)	63971500
Speedcast Holdings II LLC	4875023
Speedcast Holdings III LLC	4875088
DKH International LLC	5417059
Globecomm International LLC	4790187
Globecomm License Sub LLC	5512233
Globecomm Network Services, Corp.	2604780
Globecomm Services Maryland LLC	4337093
Globecomm Systems, Inc.	2427656
Melat Networks Inc.	4686988
ProTechnic Corp.	6098569
Speedcast Wireless, LLC	7145448
TravelComm LLC	W15399793

Exhibit B – Company Principals

Name	Title
Jim Frownfelter	CEO & Executive Chairman of the Board
Lee Eckert	Chief Financial Officer
Dee Schwalb	Chief Product Officer
Steve Salem	General Counsel
Moti Shulman	Chief Innovation Officer

Exhibit C – Speedcast’s FRNs

Speedcast Americas Inc	0025204298
Speedcast Communications Inc	0001643766
Speedcast Communications Inc	0027557354
Maritime Communication Services	0005015144
Speedcast LATAM Inc	0010802528
Globecomm License Sub LLC	0023525595
Globecomm Network Services, Corp	0009796863