

questnet GmbH Robocall Mitigation Plan

The target of this document is to describe activities and actions of questnet GmbH to detect and mitigate robocalls generated in or passed through its network.

Fraud and Robocall Mitigation Activities: questnet GmbH is permanently monitoring all traffic generated in and passed through its network to detect and mitigate fraudulent or unlawful activities. A variety of systems and processes are deployed to counter fight telecommunication fraud using leading edge technologies. This includes cooperation on national and international level with partners (e.g. carrier, provider) and authorities as well as sharing relevant information regarding fraudulent traffic streams with other peers. STIR/SHAKEN is not implemented.

As a company with business focus on Europe questnet GmbH has relatively low traffic towards USA. questnet GmbH uses different operators (e.g. QuestBlue Systems, Verizon, Colt) that fully comply with complete STIR/SHAKEN implementation.

Monitoring activities for abnormal traffic patterns which can also detect robocalls include (but are not limited to):

- Search for burst traffic
- Blocking calls from / to numbers on custom blacklists
- Base station location
- Network transmission only from numbers with PAI (P-Asserted-Identity)
- Volumes of traffic within timeframes (e.g. high volume of calls from single A-number or towards specific B-number)
- Variety of target numbers (B-party)
- Checking the identity of customers (e.g. registration data, address data, personnel identity)

Once suspicious traffic has been alerted, questnet GmbH will collaborate with customers and partners to check immediately whether the traffic is lawful. As far as questnet identifies suspicious calls or calling patterns, questnet will seek to traceback the party that is passing through its network such calls and will try to get it blocked. questnet GmbH supports fraud prevention activities and will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. questnet GmbH will cooperate with such entities in investigating and stopping any illegal robocalling activities that use its services to originate calls. In case of trace back actions questnet GmbH is limited to the following restrictions:

- Restrictions due to applicable laws and regulation
- Tracebacks and disclosure of German call detail records are subject to requests by German national regulatory authority (Bundesnetzagentur, BNetzA) or German national police
- Storage period for traffic data is legally prescribed and limited in Germany
- Existing NDA between interconnection partners involved in particular relevant call scenario

All requests have to be addressed to department "Customer Support" at questnet GmbH.

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