

Compliance Policies concerning Law and Rules of:

Telephone Consumer Protection Act - 47 U.S.C. § 227 et. seq.; Telephone Robocall Abuse Criminal Enforcement and Deterrence Act of 2019 (Pallone-Thune TRACED Act); Do-Not-Call Implementation Act of 2003 – 15 U.S.C § 6101 et. seq.

Effective December 31, 2024 for

Real Mobile, Inc. (FL)

CORES/FRN: 0020966388

RMD No.: 0006469

Prepared by assistance of:
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ADOPTED POLICY:

Real Mobile, Inc. , a Florida corporation, (REAL MOBILE) is an integrated wireless data and communications services provider that provides Interconnected VoIP (I-VoIP) services to a small select group of end-user clients. REAL MOBILE is not a gateway provider or an intermediate provider of VoIP services or routing. REAL MOBILE operates a cloud hosted IP-PBX service with integrated VoIP calling as its I-VoIP service. Its customer base is small and is composed of small office business and small government offices. REAL MOBILE provides these customers with domestic long distance VoIP calling service from the IP-PBX and e-fax and separately IoT data services and cellular/wireless Internet access services. REAL MOBILE is a retail I-VoIP and wireless provider as defined under amendments to the Federal Communications Act of 1934, as amended, and further amended by 47 U.S.C. § 227 et. seq (TRACED Act), generally, and under rules and orders promulgated by the FCC. REAL MOBILE originates voice services directly from a calling party and/or terminates voice services directly to a called party. At no time does REAL MOBILE act as an intermediate voice service provider or international gateway provider of VoIP and telecommunications services.

The following policies apply to the compliance of REAL MOBILE with Commission rules regarding robocalls when rendering its services and in responsiveness to mitigating illegal or unlawful suspected robocalls. REAL MOBILE's mitigation protocol is based upon reasonable mitigation methods either authorized by the FCC or otherwise in the custom and practice of identifying robocalls through trace backs requested from the FCC's Industry Traceback Group.

Pursuant to FCC rules in orders, REAL MOBILE has registered itself on the FCC's Robocall Mitigation Database¹ as follows: (updated as of December 31, 2024)

REAL MOBILE, INC.	U.S. Jurisdiction
I-VoIP (Retail)	RMD Number: RMD0006469

PROCEDURAL HISTORY REAL MOBILE IN COMPLIANCE WITH THIS TRACE ACT.

The following measures were implemented by REAL MOBILE pursuant to the prescribed dates:

- **REAL MOBILE dedicated ITG Traceback Response Staff.** REAL MOBILE maintains technical and administrative staff available to respond to FCC's Industry Traceback Group. Staff has access to the Network Operating Center of REAL MOBILE and customer contracts, KYC information and access to the ITG portal dashboard for Traceback requests and responses. REAL MOBILE Staff maintained is at a minimal number of 1 person personnel with this policy. This is an officer/employee of REAL MOBILE, and not contractors. Staff has been maintained since **January 1, 2024** for these purposes.
- **Calling Number Verification & Anti-Spoofing.** REAL MOBILE does not allow its customers to spoof numbers and requires clear Caller ID to be transmitted with any call. None of its subscriber numbers is the FCC DNO lists. Should REAL Mobile receive an ITG Traceback concerning any customer telephone number being used for illegal robocalls, the customer account shall be suspended for investigation and follow-up information with the ITG and thereafter shall be terminated if shown to be unlawfully using an auto dialer or similar technology or additional software to the basic calling features provided by REAL MOBILE.
- **STIR/SHAKEN Tokenization.** REAL MOBILE performs STIR/SHAKEN attestation with a recognized certifying authority and NECA ONC Declaration with a provider specific Token unique to itself that is inserted into the IP Header of routed calls terminated in the U.S. Authentication is C level for Gateways.

¹ [Robocall Mitigation Database Opens; Filing Instructions and Deadlines | Federal Communications Commission \(fcc.gov\)](https://www.fcc.gov/robocall-mitigation-database)

- **Certificating Authority:** Samsay Systems
- **OCN Designation:** **Interexchange Carrier**
- **Token ID:** 463G

- **Traffic Monitoring of Short Duration calls and anomalies.** Traffic study shall be performed periodically to ensure no origination of anomalous short duration traffic patterns calls and if encountered the customer shall be questioned on the nature of traffic and traffic source as a preliminary warning and inquiry in advance of any further mitigation action by REAL MOBILE.
- **Call Blocking.** REAL MOBILE reserves the contractual right to block and suspend customer accounts, for cause, with provider that transmit more than three (3) calls that result in Traceback requests within a 48-hour consecutive period, or more than three (3) independent Traceback requests within any given calendar month. Final review of customer suspension or termination is based upon business decision and further information that is found on the customer's KYC contact form or otherwise provided by the customer after further inquiry by REAL MOBILE.

MINIMAL TRACED ACT REQUIREMENTS OF REAL MOBILE:

- I. Policy regarding **47 CFR § 64.1200**, as amended by 2023 (Delivery restrictions); AND Federal Communication Commission's *Sixth Report And Order In Cg Docket No. 17-59*, *Fifth Report And Order In WC Docket No. 17-97*, *Order On Reconsideration In WC Docket No. 17-97*, *Order, Seventh Further Notice Of Proposed Rulemaking In CG Docket No. 17-59*, *And Fifth Further Notice Of Proposed Rulemaking In WC Docket No. 17-97* (Issued May 20, 2022).

REAL MOBILE has implemented "Know Your Customer" (KYC) contact forms to mitigate the risk that it may inadvertently process or route illegal robocalls on behalf of its customers. Contact forms are acquired from all customer upon contracting services, with updates upon request, as a part of REAL MOBILE's onboarding of the customer. Existing clients have been secured from respective providers. Contact information is updated

annually, or upon demand of REAL MOBILE. See, Exhibit A for ***Sample form of KYC Form.***

REAL MOBILE' robocall mitigation program takes guidance from ***the Best Practices for the Implementation of Call Authentication Frameworks*** by **the NANC Call Authentication Trust Anchor Working Group**. See, Exhibit C of this Policy. The efficacy of the program is evidenced by the fact that its responsiveness is well below required timetables by the FCC and has participated fully and proactively with the FCC's Industry Traceback Group ([Industry Traceback Group \(tracebacks.org\)](https://www.tracebacks.org)). As of the date of this policy, REAL MOBILE has never received a traceback request in relation to its customers or any call dialed through its IP-PBX. This statement is based upon records of the FCC's Industry Traceback Group and not internal estimates by REAL MOBILE.

a. STIR/SHAKEN Compliance.

REAL MOBILE has implemented attestation level B (Retail) as a voice service provider for all traffic pursuant to 47 C.F.R. § 64.6301 et. seq. Under this attestation level, REAL MOBILE authenticates itself as the call source or as a terminating provider whose customer has received a suspected robocall. REAL MOBILE has deployed STIR/SHAKEN protocol fully under attestation **level A** as of **December 1, 2023**. Token is inserted **on all** U.S. domestic calls sent by REAL MOBILE.

b. TRACEBAK Requests from ITG.

- i. Acknowledgement that one (1) Traceback of suspected robocall may represent multiple calls being introduced into the call flow that are

violative of the TCPA.² REAL MOBILE takes every traceback request from the ITG seriously. The mere presence of one trace back, or one call violative of the TCPA, has legal standing for enforcement by the FCC or through the courts. With a policy of best practices, every Traceback Request of a suspected robocall violative of the Federal Communications Act (FCA) will be treated as serious and result in the immediate blocking of that customer number.

ii. Minimal Response Times

Upon receipt of a traceback request from the Commission, civil law enforcement, criminal law enforcement, or the industry traceback consortium: REAL MOBILE (when acting as Retail provider) shall respond to the traceback request concerning a suspected illegal or unlawful robocall **within 24 hours**. In accordance with 47 C.F.R. § 64.1200 (c) (2)(I)(n)(11), and at a maximum, this 24-hour clock for REAL MOBILE will not start outside of business hours, and requests received during that time are deemed received at 8 a.m. on the next business day. Should the 24-hour response period end on a non-business day, either a weekend or a Federal legal holiday, the 24-hour clock does not run for the weekend or holiday in question and restarts at 12:01 a.m. on the next business day following when the request would otherwise be due. *(For example, a request received at*

² See, *Drazen v. Pinto*, No. 21-10199, 2023 WL 4699939 (11th Cir. July 24, 2023).

3 p.m. on a Friday will be returned before 3 p.m. on the following Monday, assuming that Monday is not a Federal legal holiday.) Business days are deemed to be Monday through Friday, excluding Federal legal holidays, and business hours is deemed to be 8 a.m. to 5:30 p.m. Eastern Time. on any business day. 47 C.F.R. § 64.1200 (c)(2)(I)(n)(11).

iii. Complete Information logged within ITG Portal.

REAL MOBILE has trained its staff on accessing and providing information buying through the ITG portal in regard to all traceback request received. Complete information to the best of REAL MOBILE' KYC contact form, billing records and correspondence with the upstream provider customer shall be logged into the ITG portal based upon the particular request of the ITG. REAL MOBILE Shall not at any time withhold information that is readily available from disclosure through the portal. Complete disclosure shall comprise disclosure of caller information. REAL MOBILE shall identify that the calls it transmitted contained its token and confirm its token with the ITG.

iv. Procedures upon Traceback Request

Upon receipt of a Traceback Request, REAL MOBILE shall perform and adhere to the following as appropriate:

1. Promptly investigate each transmission identified by the ITG in the Traceback Request
2. If necessary, effectively mitigating the identified offending customer who is the source of the calls and prevent that customer from continuing to place such calls. This may involve one of three measures:
 - a. **Block Outbound Customer Calling features.**
Block outgoing Calls from being placed by the subject telephone number and user of concern in the Traceback Request.
 - b. **Suspend Customer.** Suspend the Access to REAL MOBILE's IP-PBX software and network by the subject customer of the Traceback Request. This measure is reserved for repeated traceback requests within a short period of time not exceeding 48 hours, or if reoccurrence of Traceback Requests happens on an individual basis more than three times within any given calendar month.
 - c. **Terminate Customer.** Terminate dealings with the customer subject of the Traceback Request upon further occurrence within 48 hours of receipt of the Traceback Request(s). This action is reserved for

repeated Traceback Requests from the same customer after REAL MOBILE has communicated with customer about the suspected calls and has been given assurances that it will not happen, but nonetheless traceback requests to REAL MOBILE continue.

All above measures are intended to mitigate REAL MOBILE's IP-PBX system and platform from transmitting illegal customer robocalls and this is the Policy Goal of its Traceback Responses and mitigation measures.

3. Safeguarding REAL MOBILE and its communications network by using any other internal **reasonable means** to prevent entry into the U.S. of suspected traffic to prevent customers from using REAL MOBILE's network.

c. Compliance with 47 CFR 64.1200(k)(4) "FCC K4 Notice."

REAL MOBILE recognizes and acknowledges that pursuant to 47 U.S.C. § 227 et. seq the FCC may determine certain providers to be violative of the TRACED Act and send Notice to all voice service providers as prescribed by 47 CFR 64.1200(k)(4). It is understood and recognized that this notice is a notice to all voice service providers like REAL MOBILE to take immediate action with regard to the target provider and any traffic it sends to other voice service providers terminating calls within the United States. Public notice and copies of the FCC K4 Notice will be published by the FCC on its website and generally circulated through the Industry Traceback Group to warn the industry that it has made an initial determination that traffic

passed from these providers is violative of the Federal Communication Act. REAL MOBILE upon such notice being made public shall take the following actions with regard to the subject provider until final resolution or determination is made in the matter.

Call Blocking: Block inbound calls from “Bad Actors” (including known affiliate or sister companies providing voice service call termination into the U.S.) from passing through REAL MOBILE’s network to its customers. *REAL MOBILE shall inform its customers in writing (email being sufficient) that this action being taken by REAL MOBILE with regards to calls from that provider and cite the FCC K-4 Notice as reasonable cause for this action.*

For purposes of this particular policy, e-mail is deemed sufficient writing for notice to the customer or voice service provider in question.

II. Errors Occurring Under This Policy

Should an error in the performance of REAL MOBILE written policies occur, REAL MOBILE shall investigate the cause of the error and if within the control of REAL MOBILE for corrective action. Such investigation shall determine whether the cause was technical or due to human error and take remedial action to correct any technical problem and further educate any staff on the compliance requirements under this policy and under the Telephone Consumer Protection Act. Telephone Robocall Abuse Criminal Enforcement and Deterrence Act of 2019.

