



Specific to the issue of Robocalling Mitigation, we would like to mention that:

- 1) EITC already has Robocall Mitigation mechanism implemented on the EITC network to contain the instances of Robocalling domestically and internationally.
- 2) EITC Robocall Mitigation mechanism complies with “No STIR/SHAKEN Implementation – Performing Robocall Mitigation”.
- 3) EITC commits to respond to all traceback requests from US Operators and the industry traceback consortium, and to cooperate in investigating and stopping any illegal robocallers that use EITC services to originate calls, and that none of the voice traffic that originates on EITC network is authenticated with STIR/SHAKEN, and that all of the voice traffic that originates on EITC network is subject to a robocall mitigation program. EITC also certifies that EITC has implemented specific and reasonable steps taken to avoid originating illegal robocall traffic as part of its robocall mitigation program, and, if applicable, the type of extension or extensions it received under 47 CFR § 64.6304.
- 4) To ensure that Robocalling instances are neutralized:
 - a. EITC has discontinued aggregation of US Traffic from Wholesale Carriers.
 - b. EITC will only send traffic originated on the EITC network.