

To whom it may concern,

As a part of our company's registration process on the Robocall Mitigation Data Base, we hereby submit this letter along with our application to be considered as an integral part thereof. Please note however that our Company is not based in the US and in our understanding, we do not have the obligation to implement STIR/SHAKEN solution in our network. You can find below the different setups Petra Jordanian Mobile Telecommunications Company has that indicate we are not under any risk of Robocalling events:

Petra Jordanian Mobile Telecommunications Company is routing Originating traffic from its customers (including US inbound roamers and rest of world mobile roaming partners inbound roamers) to US destinations through AT&T where the CLI is the organic CLI provisioned in our network for the customer. We see a very minimal risk (and as of now not identified so far) to have a number spoofing for such traffic that would need to deploy Robocalling mitigation procedures.

- In Petra Jordanian Mobile Telecommunications Company operation, our network is a GSM based network and network access is authenticated as per the GSM authentication procedures for 2G, 3G, and VoLTE access which assures using the native MSISDN that was received from home network during registration process. Calls originating to US destinations are routed to AT&T directly without an intermediate hub. Same exactly applies for US inbound roamers in Petra Jordanian Mobile Telecommunications Company network.
- In all above Petra Jordanian Mobile Telecommunications Company operation originating traffic to US, traffic is being routed through Orange SIP gateways interconnected with AT&T with no intermediate hub that could manipulate the CLI.
- On the other hand, Petra Jordanian Mobile Telecommunications Company is not collecting and routing any transit traffic to US destinations at all whether directly or via transit centers.

We are applying the necessary measures to assure authenticity of the CLI.

In the event of any robocalling identified at Petra Jordanian Mobile Telecommunications Company network, Petra Jordanian Mobile Telecommunications Company will take all actions found necessary to control and mitigate such an event and will cooperate in investigating and stopping any illegal Robocallers that use its service to originate calls coming from US assigned North American Numbering Plan numbers, as long as it is consistent with applicable Jordan laws/regulations. Additionally, Petra Jordanian Mobile Telecommunications Company shall not be considered responsible for such an event under any circumstances and shall not be subject to the penalties included in the TRACED Act and the FCC's new rules, specifically Section 227(b) of the TCPA.

Sincerely yours,

Petra Jordanian Mobile Telecommunications Company