

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 Jordan Telecommunications Company has that indicate we are not under any risk of Robocalling events:

Jordan Telecommunications Company is routing Originating traffic from its customers 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 Jordan Telecommunications Company PSTN operation, CLI is the genuine Jordanian PSTN number.
- In Jordan Telecommunications Company Voice over broadband, IMS based authentication is used to authenticate the calling SIP client and the native Jordanian number is used as the CLI.
- Jordan Telecommunications Company enterprise customers with SIP trunks, CLI (Jordanian PSTN ranges) is authenticated for each SIP trunk, only calls with these white listed CLIs are accepted.
- In all above Jordan Telecommunications Company 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, Jordan Telecommunications Company is not collecting and routing any transit traffic to US destinations at all either directly or via transit centers.

However, due to the nature of the services provided in our network, that it's connected to carriers worldwide that could send traffic with destination in the US. We will implement the necessary measures to assure authenticity of the CLI once such routing scenario is applied in the future.

In the event of any robocalling identified at Jordan Telecommunications Company network, Jordan 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, Jordan 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,

Jordan Telecommunications Company