

## **HKBN Enterprise Solutions Limited**

### **Federal Communications Commission (FCC) Robocall Mitigation Plan**

**26 February 2026**

HKBN Enterprise Solutions Limited (“HKBNES”) is a Hong Kong-based telecommunications operator providing international direct dial (“IDD”) services to its customers. HKBNES operates as a foreign voice service provider and routes Hong Kong-originated traffic to the United States. HKBNES does not have a direct presence in the United States and does not connect directly to end-users of voice services at the terminating end of a voice call in the United States.

This plan outlines the robocall mitigation program implemented, including specific reasonable steps taken by HKBNES to avoid originating illegal robocall traffic.

#### **STIR/SHAKEN Implementation Status**

As a foreign voice service provider operating outside of the United States and utilizing non-U.S.-based facilities, HKBNES does not currently implement the STIR/SHAKEN framework. HKBNES is exempt from STIR/SHAKEN implementation requirements pursuant to 47 CFR § 64.6304(b) because:

- HKBNES originates voice traffic exclusively from outside the United States;
- HKBNES is unable to obtain a Service Provider Code (“SPC”) token from the STIR/SHAKEN Governance Authority due to the policy applicable to non-U.S. providers; and
- HKBNES’s network infrastructure is located entirely in Hong Kong.

Notwithstanding the foregoing, HKBNES is committed to implementing robust robocall mitigation measures as described in this Plan.

#### **Contractual Provisions with Customers**

HKBNES restricts how its IDD services may be used. Customers may not use the services to engage in, promote, or encourage illegal activity, or for any unauthorized, unlawful, invasive, infringing, harassing, defamatory, or fraudulent purpose. HKBNES will investigate suspected abuse or illegal activity, which may lead to suspension or termination of service to sources of abuse or illegal activity.

#### **Know-Your Customer Procedures**

HKBNES has implemented comprehensive Know Your Customer (“KYC”) procedures to evaluate and verify customers prior to activating IDD services. The KYC process includes collection and verification of:

- Customer identity and contracting party information;
- Business registration certificate or incorporation details;
- Proof of business address;
- Contact details of authorized representatives
- Nature of the customer’s business; and
- Billing information.

Any identified potential issues are subject to further review and may result in the service request not proceeding to activation. HKBNES reserves the right to request additional documentation or conduct enhanced due diligence where circumstances warrant.

#### **Traffic Origination Controls**

As a fixed network operator in Hong Kong, HKBNES only routes Hong Kong-originated traffic terminated to the United States. All such traffic carries a +852 Automatic Number Identification (“ANI”) only. HKBNES blocks all international traffic that does not originate from Hong Kong-based end users and does not support transit traffic from other jurisdictions to the United States.

This traffic origination control reduces the risk of illegal robocall traffic transiting HKBNES’s network to the United States, as HKBNES can verify that all US-bound calls originate from its own Hong Kong customer base.

### **Traffic Monitoring and Fraud Detection**

HKBNES operates monitoring systems and analytical tools to detect suspicious traffic patterns and potential illegal robocall activity. HKBNES’s monitoring capabilities include:

- **24/7 Network Monitoring:** Continuous monitoring of all voice traffic for unusual patterns or anomalies.
- **Rule-Based Detection:** Application of detection rules to identify potentially illegal or fraudulent traffic.
- **Regular Updates:** Periodic review and updated of detection rules to address emerging robocall tactics and fraud patterns.

### **Traceback Commitments**

HKBNES fully supports efforts to counter illegal robocall activity. HKBNES commits to responding within 24 hours to all traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Consortium. HKBNES will fully cooperate with these entities in investigations, including providing call detail records, customer information, and technical support to identify and stop illegal robocallers originating traffic via its service.

### **RMD Verification for Upstream Traffic**

HKBNES does not currently accept inbound U.S. traffic with NANP numbers (pertaining to the United States in the caller ID field). Should HKBNES accept such incoming traffic in the future, it will verify the upstream provider and only accept such traffic if the upstream provider is duly registered with the Robocall Mitigation Database.

### **Ownership and Management**

HKBNES is a direct, wholly owned subsidiary of Concord Ideas Ltd., which is a direct, wholly owned subsidiary of HKBN Group Limited, which, through its parent entity, is wholly owned by HKBN Ltd. HKBN Ltd. is directly owned as to 74.84% by China Mobile Hong Kong Limited (“CMHK”).

The directors of HKBNES are:

- Mr. Ling Hao, Director
- Mr. Li Xin, Director

### **Disclosure of Past Enforcements and Investigations**

HKBNES has not been subject to any formal FCC, law enforcement, or regulatory action/investigation in the prior two years involving actual or suspected wrongdoing related to illegal robocalls, spoofing, or deficient robocall mitigation certifications.

On December 8, 2025, the FCC's Enforcement Bureau issued an Order (DA-1020) directing CMHK to cure deficiencies in its RMD certification because CMHK failed to update its certification and robocall mitigation plan with the information required by changes in regulations that took effect on February 26, 2024. Following CMHK's initial registration in the RMD on September 24, 2021, the employee responsible for CMHK's RMD certification departed. At the time of their departure, the former employee did not provide CMHK with the credentials required to update CMHK's RMD certification, nor did the former employee update CMHK's contact information in the RMD to reflect their departure. As a result, CMHK did not have access to the credentials required to access the RMD and did not timely update its RMD certification or plan. CMHK undertook immediate action to correct its RMD certification upon receipt of the Enforcement Bureau's Order (DA-1020). As of December 22, 2025, CMHK has not been removed from or prohibited from filing in the RMD.