

Robocall Mitigation Plan

Business Information

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Contact Information

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Overview

In the Commission's recent release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

PLDT (HK) LIMITED ("PLDT HK") is a foreign voice service provider dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. This document delineates PLDT HK's RMP.

Know Your Customer

A PLDT HK customer is an entity that has a business relationship with PLDTHK that sends and/or terminates an international telephone voice call to PLDTHK's other carrier partners.

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with PLDT HK in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

PLDT HK's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s);

- nature of the customer's business.

These identity markers are validated for accuracy against public and paid tools.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51, PLDTHK provides the following information concerning its upstream voice service carrier.

PLDT HK is a foreign voice service provider and does not have U.S. upstream providers.

Acceptable Use Policy ("AUP")

PLDT HK maintains an International Telecommunications Services Agreement ("ITSA") with its customers to offer and provide international telephone voice calls or traffic delivered to each other for termination to various destinations. Under this agreement, the parties are required to:

- not manipulate the caller line identification of the sending party from its source
- immediately suspend or block international calls to or from suspected source of anomalous traffic
- evaluate the possibility of informing competent law enforcement and or judicial authority
- cooperate in any possible detection activity supplying each other any possible details of such traffic in accordance with the applicable data protection laws

PLDT HK's contractual terms with customers specify that PLDT HK may take action up to suspension or termination of service for violation of these ITSA provisions.

PLDT HK's contractual terms with subscribers specify that PLDT HK may take action up to suspension or termination of service for violation of the AUP.

Mitigation During Service

PLDT HK works with its upstream provider to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP-originated calls are signed with subscriber caller ID only; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

Regular traffic monitoring and analysis identifies calling patterns and behaviors which indicate illegal call activity. Examples of irregular calling patterns monitored:

- Anomalies in cost generated by calls from a single customer
- unusual traffic trends such as but not limited to:
 - unusual ratio between calling and called numbers
 - number of unique destination numbers in a time frame

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, our Anti-Fraud team will immediately coordinate with technical and commercial teams for proper control measures.

PLDT HK teams will investigate further suspicious activity found by its monitoring systems or reported to PLDT HK by subscribers of other networks or third parties. The investigation could potentially result in opening a traceback request and with PLDT HK informing its customers of the detected fraudulent activity. PLDT HK shall endorse handling of the relevant caller related to the fraudulent transaction to its customer. PLDT HK customers shall trace back to the main origin of the fraudulent call.

PLDTHK shall cooperate in traceback and trace forward investigations requested by concerned authorities when required to help stop illegal robocalls consistent with applicable laws.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

No third-party vendors are involved in PLDTHK's analytics.

PLDT HK follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, PLDT HK will devote sufficient resources to provide prompt and complete resources to traceback requests.

PLDT HK works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to PLDT HK by subscribers or third parties. The investigation could potentially result in opening a traceback request or with PLDT HK contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

For all new and renegotiated PLDT HK contracts governing the transport of voice calls, PLDT HK will endeavor to contractually require PLDT HK's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

PLDT HK will implement Do Not Originate requests it receives from the ITG. If PLDT HK and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, PLDT HK will take appropriate action which may include suspending or terminating the subscriber's use of PLDT HK PLDT HK's service. PLDT HK will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. PLDT HK will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, PLDT HK will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10)

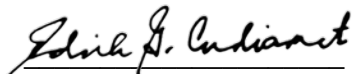
days of such update.

Certification of Editha Gomez-Cudiamat

I, Editha Gomez-Cudiamat, Director of PLDT (HK) LIMITED ("PLDTHK"), do hereby certify, under penalty of perjury, the following:

- (1) PLDTHK is a foreign voice service provider and does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- (2) PLDTHK 's Business name and primary address are as follows:

PLDT (HK) LIMITED
Room 2002, 20/F Officeplus@Wanchai
No. 303 Hennessy Road
Wan Chai, Hong Kong
- (3) PLDTHK has no other business names in use.
- (4) PLDTHK previously used the business name "Rich Asset Group Limited".
- (5) The owners, directors, subsidiaries/affiliates, and parent companies of PLDTHK are shown in the Appendix I attached hereto.
- (6) None of the persons/entities in item 5 have had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (7) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (8) PLDTHK's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (9) PLDTHK has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (10) PLDTHK is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (11) PLDTHK does not and is not required to have an operator company number.


Editha Gomez-Cudiamat

Appendix I as of April 25, 2024

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