

Robocall Mitigation Plan

Business Information

PLDT Inc. ("PLDT")
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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 is a foreign voice service provider dedicated to stopping illegal calls originating from its network and monitoring the calls coming into its network. This document explains PLDT's RMP for all types of anomalous or fraudulent calls.

Know Your Customer

A PLDT customer is a person/entity that has a business relationship with PLDT in which we transmit, originate, and/or terminate calls on behalf of its subscribers or end-users. As a service provider, PLDT keeps specific information about its customers, including contact information. PLDT has information about each customer, including identity markers, which it collects during the account subscription process. These include but are not limited to: name, email address, and contact phone number. These identity markers are validated for accuracy against public and paid tools.

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 a person/ entity that has a business relationship with PLDT in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

PLDT'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,.

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, PLDT provides the following information concerning its upstream voice service carrier.

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

Acceptable Use Policy

PLDT maintains an Acceptable Use Policy ("AUP") that customers must sign before being permitted to use PLDT's network. Among other things, this AUP prohibits:

- using the Services in order to transmit, distribute or store material: (a) in violation of any applicable law or regulation, including export or encryption laws or regulations; (b) that may adversely affect Services or the other subscribers of the PLDT Group; or (c) that may expose the PLDT Group to criminal or civil liability;
- using the Services to transmit or distribute material containing fraudulent offers for goods or services, or any advertising or promotional materials that contain false, deceptive, or misleading statements, claims, or representations;
- furnishing false or incorrect data to PLDT on written or online applications, contracts, or other materials or information provided to PLDT, including fraudulent use of credit card numbers or "bill to" telephone numbers.

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

PLDT customers are obliged to undertake all required actions necessary to ensure that it and its end-users comply with applicable laws or regulations, and that its end users will not utilize the PLDT services in a manner that results in a violation of any applicable laws or regulations. PLDT customers acknowledge that the advertising of goods, services, or real property by the transmission of unsolicited voice messages, facsimiles, emails or text messages may be penalized for violation of applicable laws or regulations.

Mitigation During Service

PLDT 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:

- IP-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 measure, to the fullest extent allowed by law.

PLDT will investigate suspicious activity found by its monitoring systems or reported to PLDT by subscribers or third parties. The investigation could potentially result in opening a traceback request or with PLDT contacting a subscriber to correct improper use of the platform, or, if the subscriber/customer does not respond or comply, to block their use of the platform.

Under PLDT's contracts, PLDT shall cooperate in traceback and trace forward investigations requested by concerned authorities when required to help stop illegal robocalls in compliance with applicable laws or regulations.

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

PLDT 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 will devote sufficient resources to provide prompt and complete resources to traceback requests.

PLDT works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to PLDT by subscribers or third parties. The investigation could potentially result in opening a traceback request or with PLDT 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 contracts governing the transport of voice calls, PLDT will endeavor to contractually require PLDT's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

PLDT will implement Do Not Originate requests it receives from the ITG. If PLDT and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, PLDT will take appropriate action which may include suspending or terminating the subscriber's use of PLDT's service. PLDT's commercial team can request call blocking in compliance with this Robocall Mitigation Plan. PLDT 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 will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

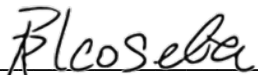
In the event of any material change to this plan, PLDT will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Benedict Patrick Alcosoba

I, Benedict Patrick Alcosoba, FVP and Head – Enterprise Product Management and Marketing, do hereby certify, under penalty of perjury, the following:

- (1) PLDT Inc. ("PLDT") 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) PLDT 's Business name and primary address are as follows:

PLDT Inc.
Ramon Cojuangco Building, Makati Avenue,
Makati City, Philippines
- (3) PLDT has no other business names in use.
- (4) PLDT previously used the following business name: "Philippine Long Distance Telephone (PLDT) Company."
- (5) The owners, directors, subsidiaries/affiliates, and parent companies of PLDT are shown in the Appendix I attached hereto.
- (6) To the best of my knowledge and belief, 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) PLDT's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (9) PLDT has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (10) PLDT is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (11) PLDT does not and is not required to have an operator company number.


Benedict Patrick Alcosoba

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