

Ref: Axistel Implementation – Performing Robocall Mitigation

FRN: 0031050552

September 24, 2021

To whom it may concern:

Axistel Fze certifies that it commits to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls, and that some of the voice traffic that originates on its network is authenticated with STIR/SHAKEN, and the remainder of the voice traffic that originates on its network is subject to a robocall mitigation program. Axistel Fze also certifies that the attached searchable PDF details the specific reasonable steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program, and, if applicable, the type of extension or extensions it received under 47 CFR § 64.6304.

Axistel Fze's platform will implement in the next month's partial Stir/Shaken signatures. This means that our platform will pass calls received with the Stir/Shaken identity message header without alteration. At this time Axistel Fze is not currently implementing our own signature (full Stir/Shaken). Currently Axistel Fze is processing all calls, however over the coming weeks, we will be implementing updated policies to address two core identifiable issues related to Stir/Shaken. First, is the handling of calls if no Stir/Shaken identity message header is received. And second, is the handling of calls if the Calling Number within the Stir/Shaken identity header has been altered. Furthermore, we request you keep all of our certifications confidential. Should you require any additional information, please feel free to contact me directly.

Axistel Fze has implemented "know your customer" and traffic monitoring processes to mitigate the risk that it may inadvertently process or route illegal robocalls on behalf of its customers.

Axistel Fze follows procedures for ensuring it knows the identities of its customers, especially ones whose service permits them to engage in high volume calling campaigns, such as businesses engaged in telemarketing or contacting their customers for legitimate purposes. To the extent that we were to receive information from law enforcement or other sources that a customer is engaged in illegal calling, our policy is to cooperate fully, including by providing the identity of any suspected illegal robocaller pursuant to legal service of process. And our contracts with enterprise customers include clauses granting Axistel Fze the right to terminate service if customers are making illegal calls.

Axistel Fze is committed to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Sincerely,

Hiren Kakad

Axistel Fze Inc.

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