

# MY COUNTRY MOBILE

## Robocall Mitigation Program Description

Filed pursuant to 47 CFR § 64.6305 •

### Overview and Provider Classification

My Country Mobile operates as both a Gateway Provider and an Intermediate Provider within the North American Numbering Plan (NANP) ecosystem. As a Gateway Provider, My Country Mobile receives international voice traffic and routes it into the US telecommunications network. As an Intermediate Provider, My Country Mobile carries and routes calls between originating and terminating providers for selected regions and routes.

This Robocall Mitigation Program Description is submitted pursuant to 47 CFR § 64.6305 to document our multi-layered approach to preventing the origination and transmission of illegal robocall traffic. My Country Mobile is fully committed to cooperation with FCC enforcement, the US Telecom Traceback Consortium, and all applicable regulatory requirements.

### Robocall Mitigation Program — Core Components

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <p><b>Customer Verification and Know-Your-Customer (KYC) Procedures</b></p> <ul style="list-style-type: none"><li>• All new and renewing customers must submit government-issued identification and/or business registration documents.</li><li>• Submissions are verified against government databases and third-party data sources.</li><li>• New customers undergo enhanced due diligence including review of business purpose, intended traffic types, and traffic volume patterns prior to activation.</li><li>• Renewing customers are subject to annual compliance re-verification.</li><li>• All KYC records are maintained securely and updated as material changes occur.</li></ul> |
| 2 | <p><b>Signed Agreements and Contractual Compliance Obligations</b></p> <ul style="list-style-type: none"><li>• All customers and resellers must execute a formal agreement prior to service activation.</li><li>• Agreements expressly prohibit origination or transmission of illegal robocalls, spoofed calls, or unauthorized traffic.</li><li>• Customers must maintain compliance with FCC rules including STIR/SHAKEN obligations where applicable.</li><li>• Agreements mandate immediate reporting of known or suspected violations.</li></ul>                                                                                                                                        |

- Customers must maintain an operational website with a functional domain; violations trigger immediate suspension.

3

### Blocking Invalid and Spoofed ANIs

- Our switch employs real-time mechanisms to detect and block invalid, unallocated, or spoofed Automatic Number Identification (ANI) values.
- Calls bearing ANIs not assigned or allocated within the NANP are blocked at ingress.
- Caller ID manipulation inconsistent with legitimate use is flagged and terminated.

4

### Blocking Invalid Outbound Termination and DNC Compliance

- All invalid outbound termination traffic is blocked at the switch level.
- Do Not Call (DNC) compliance is enforced network-wide.
- Traffic destined for DNC-registered numbers without proper exemptions is blocked.

5

### Call Analytics and Spam / Spoofing Detection

- In-house call analytics systems perform real-time pattern recognition, anomaly detection, and behavioral analysis.
- Daily reports are generated to identify, track, and act on spam and spoofed call activity.
- Any ANI flagged for spam or suspicious activity is promptly blocked.
- All analytics processing is performed internally; no third-party analytics vendors are currently used.

6

### Zero Tolerance Policy for Repeated Violations

- Customers found to be persistently engaging in spoofing or robocall activity are permanently removed from the platform.
- Reinstatement is not permitted for customers subject to a permanent block.
- All violation incidents are documented and retained for compliance records.

7

### Cooperation with US Telecom Traceback Consortium

- My Country Mobile fully cooperates with the US Telecom Traceback Consortium, the FCC, and law enforcement.
- All traceback requests are responded to within 24 hours of receipt.
- We work collaboratively with upstream and downstream providers to identify sources of unauthorized calls.
- Traceback cooperation records are maintained for regulatory review.

8

**Enhanced Monitoring and Proactive Traffic Oversight**

- Network systems are continuously monitored for unusual call patterns including high-volume short-duration calls, rapid ANI cycling, and atypical traffic bursts.
- Automated alerts trigger immediate review and potential blocking of suspected robocall traffic.
- Traffic anomaly data is reviewed daily and monthly trend reports are maintained.

9

**Strict Controls on High-Risk Traffic and Routes**

- Stringent controls are enforced on high-risk international and domestic routes.
- Dynamic blocking is applied based on behavior analysis, complaint data, and volume thresholds.
- High-risk route policies are reviewed quarterly and updated as threat intelligence evolves.

10

**STIR/SHAKEN Compliance (Gateway Provider Obligations)**

- As a Gateway Provider, My Country Mobile complies with applicable STIR/SHAKEN call authentication requirements.
- International calls entering the US network through My Country Mobile are processed in accordance with FCC gateway provider authentication rules.
- We cooperate with downstream providers on authentication transparency and traceback integration.

11

**Regular Training and Regulatory Updates**

- Operations and compliance staff receive regular training on robocall prevention, FCC regulations, and industry best practices.
- Training programs are updated as FCC rules, orders, or guidance evolve.
- Staff are briefed on new threat vectors and mitigation techniques on an ongoing basis.

12

**Customer Education and Compliance Awareness**

- My Country Mobile actively educates customers regarding FCC obligations, acceptable use policies, and consequences of non-compliance.
- Compliance guidance is provided at onboarding and refreshed annually.
- Customers are notified of regulatory updates that affect their obligations under their service agreements.

13

**Audit and Program Review Processes**

- Regular internal audits of customer traffic, compliance protocols, and mitigation effectiveness are conducted.

- Audit findings are documented and remediation actions are tracked to completion.
- This Robocall Mitigation Program Description is reviewed and updated within 10 business days of any material change.

### Enforcement History

As of the date of this filing, My Country Mobile and its principals/affiliates have not been subject to any FCC, law enforcement, or regulatory investigations or enforcement actions related to illegal robocalling, spoofing, or Robocall Mitigation Program deficiencies in the prior two years.

In the event of any change to this status, My Country Mobile will update this filing within 10 business days as required by FCC rules.

### Program Commitment

This program is actively implemented and reviewed for effectiveness. My Country Mobile commits to updating this description and its RMD filing within 10 business days of any material change, in accordance with FCC rules and 47 CFR § 64.6305.