

TopCo Robocall Mitigation Policy

This procedure describes the general conditions and terms ("Policies") under which access to the service will be governed to make international long distance calls to the United States, mitigating Robocall; through the Comunicard product, issued and marketed by TOP COMUNICACIONES ESTEGIA, C.A. (TOP COMUNICACIONES), a commercial company domiciled in the city of Caracas, Venezuela and registered in the First Mercantile Registry of the Judicial District of the Federal District (now Capital District) and Miranda State, on February 9, 2000.

A. INTRODUCTION

To perform Robocall Mitigation Top Communications Estegia, CA, (Top Communications) certifies that it agrees to respond to and cooperate with all trace requests from the Commission, law enforcement, and the industry trace consortium. entities to investigate and stop any illegal Robocallers using our service to originate calls, and that no voice traffic originating from their network is authenticated with STIR/SHAKEN, and all voice traffic originating from their network is subject to a robocall mitigation program.

Top Communications also certifies that this attached searchable PDF details the specific reasonable steps it has taken to mitigate illegally sourced robocall traffic as part of our robocall mitigation program and, if applicable, the type of extension(s) that you received under 47 CFR § 64.6304.

B. GENERAL PROHIBITION OF ILLEGAL ROB CALLS

The voice call service offered to our clients is a prepaid service associated with a personal identification number (PIN) whose length is 16 digits, randomly generated with a balance previously purchased by the client. The only way to access this service is by dialing a non-geographic 0800 number, that is, the international long-distance service cannot be accessed directly. These characteristics mean that the service offered is limited in duration and once said balance expires, the client must make another call, mitigating the generation of automatic calls through the Top Communications VoIP platform.

Additionally, Top Communications end user services are subject to the restrictions contained in our published notices in "general terms and conditions of service" and also to the following:

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- Provide altered or false information about the origin of Subscriber "A" or origin of the call.
- Violation of regulations generated by the regulatory body in Venezuela (CONATEL).
- Participation in any fraudulent activity.

C. TELEPHONE TRAFFIC MONITORING

The Top Communications VoIP platform allows the generation of call reports to different international destinations, including the United States; offered in real time and will flag calling patterns that indicate potential illegal call theft.

D. COOPERATION IN TRACKING AND ENFORCEMENT

Top Communications will actively cooperate with the tracking community, including the FCC and law enforcement, to investigate and stop illegal robocalls. Top Communications will dedicate sufficient resources to provide prompt and complete responses to trace requests.