

Robocall Mitigation Plan

This Robocall Mitigation Plan is submitted by Galactic Technology Group Inc. in accordance with 47 C.F.R. § 64.6305, as adopted by the Federal Communications Commission (FCC), which mandates that all “voice service providers” develop a “robocall mitigation plan.” This document outlines the Provider’s current policies and procedures aimed at reducing or eliminating outbound illegal robocalls originating on its network. The Provider believes these policies and procedures constitute “reasonable steps” to prevent illegal robocalls from originating on its network. In addition to implementing these measures, the Provider will respond to any traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and cooperate with these entities to investigate and halt any illegal robocallers utilizing its service.

I. STIR-SHAKEN Implementation Status

As indicated in the FCC’s Robocall Mitigation Database, the Provider’s STIR-SHAKEN implementation status is as follows:

- The Provider partners with a wholesale carrier that has deployed STIR/SKAKEN on its network, and every call originating on the Provider’s network is covered by this Robocall Mitigation Plan, which seeks to prevent illegal robocalls.
- At this time, the Provider relies on its wholesale carrier for STIR/SKAKEN authentication.

II. Traceback Requests

As stated above, the Provider will fully cooperate with the FCC, law enforcement, and the ITG on all traceback requests and investigations. To facilitate prompt and thorough responses to illegal robocall activities, the Provider will allocate adequate resources to quickly respond to any traceback request received from these entities, committing to provide a complete response within 24 hours of receipt. Appendix A to this Plan designates a single point of contact for receiving traceback requests. Going forward, the Provider will include provisions in its carrier interconnection and service agreements requiring all parties to cooperate with traceback efforts. Such provisions will specify the obligation to promptly identify either the upstream provider from whom a suspicious call was received or the customer initiating the call.

III. Customer Vetting Practices

To minimize or prevent the origination of illegal robocalls using its voice services, the Provider employs best practices to verify the identity of all voice service subscribers. This vetting process helps determine a subscriber's legitimacy for establishing a service relationship. Generally, the Provider confirms a customer's identity by collecting information such as physical location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business. The Provider's vetting activities for both retail and commercial subscribers occur during:

- Service provisioning (e.g., determining the appropriate facilities based on intended use),
- Execution of the Provider's required service agreements, and
- Assignment of telephone number resources.

Since commercial end users—especially larger businesses with complex service setups—can pose a higher risk for illegal robocall activity, the Provider may, at its discretion, subject them to additional scrutiny, including more in-depth background checks and possibly on-site visits.

IV. Telephone Number Validation Practices

Telephone Number Validation involves confirming that a customer or end user is authorized to use a particular telephone number with their subscribed voice services. Following industry best practices, the Provider has procedures in place to confirm the right of the calling customer to use each telephone number. Specifically:

- Subscribers may only use a caller ID number if it is assigned by the Provider or obtained through an underlying partner.
- For single-line subscribers (whether TDM or IP), the Provider's switching equipment only accepts calls from the phone number assigned to that subscriber.
- For multi-line telephone system subscribers (TDM or IP), the Provider screens every outgoing call, allowing only those calls that originate from a number assigned to that subscriber.

These screening mechanisms allow for an automated, secure way to validate originating telephone numbers.

V. International Call Originators

Currently, the Provider does not supply international voice services. Should the Provider in the future offer services to international call originators utilizing North American Numbering Plan resources, it will familiarize itself with and adopt best practices to thoroughly vet such customers and confirm proper telephone number usage for all internationally originated calls.

VI. Know Your Upstream Provider Procedures

The Provider uses a limited number of upstream providers to handle and terminate its originated calls. It has established, long-term relationships with these upstream providers and remains informed about their businesses and the legitimacy of their services. To deliver the highest quality services, the Provider is committed to ensuring that any upstream providers are equally devoted to preventing illegal robocalls on their networks. This commitment includes incorporating anti-robocall measures into any contracts with upstream providers. Appendix A to this Plan includes a list of the Provider's current upstream providers.

VII. Ongoing Robocall Mitigation Practices

The Provider actively monitors its network usage and regularly reviews call detail records (CDRs) to identify any suspicious calling activity or patterns indicative of illegal robocalls. If the Provider detects usage patterns consistent with illegal robocalls or suspects illegal robocalling or spoofing, it immediately seeks to identify the responsible party and take appropriate action. Such action may include:

- Initiating a traceback investigation,
- Verifying the customer's right to use the Caller ID number,
- Checking that the Caller ID name aligns with the customer's corporate name, trademark, or d/b/a name,
- Blocking or terminating the offending party's ability to make calls on the Provider's network, and/or
- Notifying law enforcement authorities.

As part of its commitment to preventing illegal robocalls at the source, the Provider concentrates on early detection and prompt investigation of potentially problematic calling behavior, paying particular attention to:

1. Unusually high subscriber traffic volumes, sharp traffic spikes, or inconsistent calling patterns,
2. Short-duration calls or low call completion rates,

3. Sequential dialing patterns,
4. Repeated calls to Do-Not-Call registry or invalid numbers, and
5. Calls to NPA-NXXs that have not been assigned by the North American Numbering Plan Administrator.

Appendix A

Traceback Request Single Point of Contact:

Name: Christopher Huss

Title: President

Phone Number: (786) 231 - 3334

Email Address: chuss001@galactic.company

Upstream Provider Information:

Name of Upstream Provider: Bandwidth.com

Nature of Business: Wholesaler