

Sociedad de Telecomunicaciones y Servicios SpA

Robocall Mitigation Plan

Sociedad de Telecomunicaciones y Servicios SpA (the “Company”) hereby submit this Robocall Mitigation Plan (the “Plan”) to the Federal Communications Commission (“FCC”) pursuant to the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act.

- (1). The Company follows the USTelecom Industry Traceback Group (“ITG”) guidelines in order to: (1) provide for the robust protection of voice networks and users of such services from fraudulent, abusive, and/or unlawful robocalls; (2) work to reduce the number of illegal robocalls; (3) identify the source of such calls through Trace back and Trace Forward efforts; and (4) implement Do Not Originate (DNO) procedures when requested by governmental agencies. The Company takes all necessary steps to ensure that it will not meet the definition of a Non-Cooperative Voice Service Provider.
- (2). The Company’s experienced telecommunications personnel continually monitor our network to identify and mitigate any irregular traffic patterns to reduce fraudulent and/or illegal robocall traffic. When the Company identifies potentially fraudulent, abusive, suspicious, or robocalling traffic patterns; it acts swiftly to mitigate this activity.
- (3). The Company requires customers to manually InterOp and test with us prior to on-boarding. The company does not automate this process so we can physically interact with carriers prior to allowing them to pass traffic on our network.