

## Robocall Mitigation Plan

**Company Name:** COMTALK TELECOM LLC

**FCC RMD ID:** RMD0011908

**Date:** December 11, 2024

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### Introduction

COMTALK TELECOM LLC is committed to ensuring compliance with the Federal Communications Commission's (FCC) rules and regulations concerning robocall mitigation. As part of our efforts to combat illegal robocalls, this Robocall Mitigation Plan outlines the specific measures and practices our company implements to prevent the origination, carrying, and processing of unlawful robocall traffic on our network.

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### Certification of Compliance

COMTALK TELECOM LLC certifies that:

1. All calls originating on our network are subject to a comprehensive robocall mitigation program.
  2. No prior certifications have been removed by FCC action, and the company has not been prohibited from filing in the Robocall Mitigation Database (RMD).
  3. The company has fully implemented STIR/SHAKEN on applicable portions of its Internet Protocol (IP) network and complies with all FCC requirements.
  4. The company commits to responding fully to traceback requests within 24 hours.
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### Robocall Mitigation Measures

#### 1. Prevention of Illegal Robocalls

- **Customer Screening:** Before onboarding new or renewing customers, COMTALK TELECOM LLC conducts a thorough Know Your Customer (KYC) process. This includes:
    - Verification of personal identification documents such as passports.
    - Validation of address details.
    - Verification of incorporation documents for businesses.
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COMTALK TELECOM, LLC  
200 South Andrews Ave, Suite 504  
FL – Fort Lauderdale, 33301  
U.S.A

- These checks are conducted via a trusted external company to ensure thorough and unbiased validation.
- **Contractual Obligations:** All customer agreements include provisions that strictly prohibit the origination of illegal robocalls or spoofed calls. Violations will result in immediate termination of service, and such matters are reported to the relevant authorities.

## 2. Call Analytics and Monitoring

- **Automated Call Analytics:**
  - We utilize advanced call analytics systems to monitor call patterns, identify abnormal traffic behavior, and flag potentially illegal robocalls.
  - Third-party analytics providers are employed to supplement internal systems, ensuring robust detection capabilities.
- **Real-Time Monitoring:**
  - A dedicated network operations team provides 24/7/365 monitoring of our network and all customer traffic.
  - Monitoring includes checks against Do-Not-Originate (DNO) lists, Do-Not-Call (DNC) lists, known spam numbers, invalid caller IDs, and IP addresses with bad reputations.
  - Suspicious traffic is immediately investigated, and remedial action is taken if necessary.

## 3. Upstream Provider Verification

- COMTALK TELECOM LLC ensures that all upstream providers comply with FCC regulations by conducting due diligence on their robocall mitigation practices.
- Written certifications are obtained from upstream providers affirming their commitment to legal calling practices and STIR/SHAKEN implementation.

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## Network and Technology Standards

### 1. STIR/SHAKEN Implementation

- COMTALK TELECOM LLC has fully implemented STIR/SHAKEN on all applicable portions of its IP network. This ensures that all calls are authenticated and verified to prevent illegal robocalls and spoofing.

## 2. Call Blocking and Filtering

- Illegitimate call traffic is proactively blocked based on:
  - Analytics results.
  - Reports from traceback investigations.
  - FCC and industry blacklists.

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## Traceback and Compliance Procedures

- **Response to Traceback Requests:**
  - COMTALK TELECOM LLC commits to responding to all traceback requests from the FCC, industry traceback consortiums, or law enforcement agencies within 24 hours.
- **Internal Investigations:**
  - A compliance officer oversees all traceback requests and ensures proper investigation and reporting of findings.
  - Customers identified as sources of illegal robocalls are suspended or terminated as appropriate.

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## Business Information

- **Company Name:** COMTALK TELECOM LLC
- **Business Address:** 200 South Andrews Ave, Suite 504 FORT LAUDERDALE, FL 33301, USA
- **Contact Information:**
  - Compliance Officer: Mads Mortensen
  - Phone: +1 954 400 0989
  - Email: [legal@comtalk.tel](mailto:legal@comtalk.tel)
- **Principals, Affiliates, Subsidiaries, and Parent Companies:** SIP TERMINATION S.L, FONECLOUD GmBH, FONECLOUD AB, FONECLOUD WHOLSALE UK Ltd, FONECLOUD SAS

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## **Commitment to Compliance**

COMTALK TELECOM LLC is dedicated to maintaining full compliance with FCC regulations and industry standards to ensure transparency, accountability, and the prevention of illegal robocall traffic on our network. This plan is reviewed and updated regularly to reflect changes in regulatory requirements and industry best practices.

## **Authorized Representative:**

Mads Mortensen

Owner

COMTALK TELECOM LLC

December 11, 2024