

## **Express Teleservice Corporation**

### **ROBOCALL MITIGATION PLAN**

Express Teleservice Corp. dba. Lanck Telecom ("Lanck Telecom") establishes the following Robocall Mitigation Plan ("RMP") to prevent illegal robocalls from being carried and processed thorough Lanck Telecom network.

Lanck Telecom is a U.S.-based entity that carries or processes traffic traversing the public switched telephone network (PSTN) at any point, insofar as Lanck Telecom neither originates nor terminates that traffic.

#### **1. Implementation of STIR/SHAKEN**

Lanck Telecom has certified the status of STIR/SHAKEN implementation and robocall mitigation on its networks in the Robocall Mitigation Database and will deploy the STIR/SHAKEN standard by June 30, 2023.

#### **2. 24-Hour Traceback Response Obligation**

Lanck Telecom will respond to all traceback requests from the Federal Communications Commission ("FCC"), law enforcement, and the industry traceback consortium within-24 hours and will cooperate with such entities in investigating and stopping any illegal robocallers that use or attempt to use Lanck Telecom services to carry or process calls.

#### **3. Know Your Upstream Provider**

Lanck Telecom has implemented appropriate Know Your Upstream Provider ("KYC") procedure when onboarding new or renewing customers. As part of its KYC procedure, Lanck Telecom requires any customer to provide sufficient information to ensure its legitimacy and compliance with the applicable regulation, such as physical business location, contact person(s), state or country of incorporation, federal tax ID, the nature of customer's business.

#### **4. Robocall mitigation practices**

Lanck Telecom has implemented robocall mitigation practices that helps to avoid carrying or processing illegal robocall traffic:

- 4.1. Lanck Telecom analyzes traffic using its proprietary Fraud Management System ("FMS"). It monitors both inbound and outbound traffic in real time, using AI and other cutting-edge technology, spotting Robocalls among other fraud scenarios. The overall, system detects and counters following fraud scenarios: Robocalls, PBX Hacking, Wangiri, Wangiri Callbacks, P2S Fraud, Enterprise Callbacks Fraud, Flashcall Fraud, Conference Callbacks Fraud, IRSF, Artificially Generated Traffic, Spam, Flashcalls.
- 4.2. Lanck Telecom FMS tool features a comprehensive database of fraudulent, suspicious and dangerous numbers and ranges – FMS Proactive Monitoring module. Such numbers and ranges are usually obtained from associations - GSMA FASG, CFCA, i3Forum and others; also the numbers used to carry illegal traffic are detected when analyzing traffic transmitted over Lanck Telecom's network. Lanck Telecom applies analytical and testing procedures for additional assurance, and then includes the numbers into the FMS database. Lanck Telecom also has a set

of procedures, that vet the database, and make sure no-longer-fraudulent numbers are promptly excluded.

The Proactive Monitoring module monitors traffic in real time and administers blocking and rejecting swiftly, typically within a few milliseconds of a voice call's arrival to routing.

#### **5. DNO Blocking**

Lanck Telecom blocks calls purporting to originate from a number on a reasonable do-not-originate list that among others includes (1) North American Numbering Plan Numbers that are not valid or (2) valid North American Numbering Plan Numbers that are not allocated to a provider by the North American Numbering Plan Administrator.

#### **6. Mandatory Blocking**

Lanck Telecom, when properly notified by the FCC, will block identified illegal traffic and any substantially similar traffic on an ongoing basis (unless its investigation determines that the traffic is not illegal) when it receives actual written notice of such traffic by the FCC through its Enforcement Bureau.

#### **7. Accepting Traffic from providers in the RMD**

Lanck Telecom accepts traffic from customers which use North American Numbering Plan Numbers that pertain to the United States in the caller ID field only if customer's filing appears in the Robocall Mitigation Database and that filing has not been de-listed pursuant to an enforcement action.

#### **8. Mitigation of Illegal Robocalls**

Lanck Telecom contract contain terms that (1) require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal traffic was received, and (2) prohibit to use Lanck Telecom services for carrying and proceeding illegal traffic.

#### **9. Robocalls mitigation team**

Lanck Telecom had appointed robocall mitigation team to address robocalls mitigation related issues. Lanck Telecom's robocall mitigation team can be contacted by email: [traceback@lancktele.com](mailto:traceback@lancktele.com).

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