

ROBOCALL MITIGATION PLAN (RMP)

Prepared for the Federal Communications Commission (FCC) Robocall Mitigation Database

1. Company Information

Company Name: Onoffapp OÜ

FCC Registration Number (FRN): 0030952121

Company Address: Metro Plaza, 2 Viru Väljak, Tallinn 10111, Estonia

Point of Contact (Name & Title): Taig Khris Gattos

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2. STIR/SHAKEN Implementation Status

Pursuant to 47 CFR § 64.6305, Onoffapp OÜ certifies the following status (Check one):

- ☐ **Full Implementation:** STIR/SHAKEN will be fully deployed on all IP portions of the network.
- ☒ **Partial Implementation:** STIR/SHAKEN is currently being deployed on the IP portions of the network..
- ☐ **Implementation Extension:** Operating under an active FCC extension but maintaining this RMP.

Onoffapp OÜ has started negotiations to implement STIR/SHAKEN through a **Hosted Signing Agreement** with **Peerless**. Onoffapp OÜ will maintain its own SPC token and utilizes Peerless infrastructure to cryptographically sign calls at the network edge, ensuring all IP-originated traffic carries valid caller identity attestation. Once the certificate is issued by an approved Certificate Authority, Onoffapp OÜ will update its status in the Robocall Mitigation Database

3. Core Mitigation Strategies

Onoffapp OÜ employs a multi-layered defense strategy to ensure illegal traffic does not originate from, or transit through, our network.

A. Advanced Know Your Customer (KYC) Protocols

We prevent illegal robocalling at the source by vetting all clients before providing service:

- Identity Verification:** We are already requiring ID documentation **for B2C customers**, and we start collecting and verifying proof of address by the end of March 2026.
- For B2B customers** we require valid business registration, tax IDs and physical address verification.
- Traffic Profile Analysis:** We assess customers call volume, use case (e.g., telemarketing, alerts, customer service).

B. Real-Time Network Monitoring

- We use a third party product named **“BICS FraudGuard”** edited by **BICS Proximus**, a major telecom and electronic service provider. **This product enables us to deploy fraud prevention and security measures and actions.**
- **This product has won the Telco Innovation Award for “Best Robocall Mitigation Solution”.**

C. Caller ID Integrity

- **Unauthorized Number Prevention:** We prohibit customers from "spoofing" numbers they do not own or have the legal right to use.
- **Attestation Levels:** We/Our Partner Peerless apply **A, B, or C** attestations based on our confidence in the caller’s identity and their right to use the telephone number.

4. Traceback Cooperation & Enforcement

Onoffapp OÜ recognizes that rapid response is the key to stopping active campaigns.

- **24-Hour Response:** We commit to responding to all **Industry Traceback Group (ITG)** requests within 24 hours.
- **Zero Tolerance Policy:** Any customer found to be intentionally originating illegal robocalls will have their services terminated immediately without a refund.

5. Foreign Provider Compliance:

As a foreign voice service provider, Onoffapp OÜ expressly commits to complying with all FCC requests for information regarding illegal robocalls and to maintaining a registered agent for service of process in the United States. (Registered Agents Inc., 1717 N Street NW STE 1, Washington, DC, 20036, US).

6. Continuous Improvement

Our compliance team reviews our mitigation effectiveness quarterly. This includes:

1. We are in negotiation with commercial providers to be able to update blocked number lists based on FCC and FTC "Do Not Call" data.
2. Refining monitoring algorithms to catch evolving "scam" tactics (e.g., neighbor spoofing) with the abovementioned Bics FraudGuard product.

7. Certification and Attestation

I, Taig Khris, certify that I am the CEO of Onoffapp OÜ and that I have personal knowledge of the facts contained in this Robocall Mitigation Plan. I certify that Onoffapp OÜ is implementing the STIR/SHAKEN authentication framework as described herein and is in full compliance with 47 CFR § 64.6305. I acknowledge that any false or inaccurate statement in this plan may result in a forfeiture of at least \$10,000 per violation and/or removal from the Robocall Mitigation Database.

DocuSigned by:



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Signature: _____ Date: 27 February 2026