



Robocall Mitigation Plan

1. Company Information

Legal Company Name: Amiba Inc

Doing Business As (DBA): N/A

FCC Registration Number (FRN): 0033876434

Company Type: Voice Service Provider

Primary Contact Name: Kevin Doherty

Title: Chief Financial Officer (CFO)

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Business Address:

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Sarasota, FL 34236

Headquarters Address:

Magnet Building, Dublin D17AK77

Clonsaugh Business and Technology Park, Ireland

Website: www.amibacom.com

All calls originating on the Amiba Inc. network are from NANPA numbers obtained from VoIP Innovations. No foreign end users originate calls on the U.S. based network.

2. Overview of Robocall Mitigation Program

Amiba Inc has implemented a comprehensive Robocall Mitigation Program designed to prevent the origination and transmission of illegal robocalls on its network. This program aligns with the FCC's rules under 47 CFR § 64.6305 and applies to all domestic and international call traffic.

The company uses a layered mitigation strategy combining **STIR/SHAKEN implementation, traffic monitoring, customer vetting**, and **enforcement policies** to detect, prevent, and respond to unlawful robocalling activity.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation acting as a Wholesale provider originating calls and serving end-users.
- Our downstream carrier is Sangoma/VoIP Innovations(RMD0004048).

Amiba, Inc has not been prohibited from filing a certification in the Robocall Mitigation Database.

Amiba, Inc does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

3. STIR/SHAKEN Implementation Status

- **STIR/SHAKEN Deployment:** Fully Implemented
- **Scope:** Implemented on all SIP interconnections within our IP network.
- **Certificate Authority:** Sansay, using our own OCN 375L and SPC issued by the STI-PA
- **Attestation Levels:** Full **A-Level Attestation** for all calls originated by verified customers.

4. Customer Vetting and Onboarding

Before activating service, Amiba Inc: - Verifies customer identity and business legitimacy using **Know Your Customer (KYC)** procedures. We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

- Requires valid **corporate registration, tax ID, and service agreement.**
- Reviews the customer's intended use of telecommunications services to ensure lawful and compliant use cases.
- Prohibits customers from using its services for illegal or unsolicited robocalling.

5. Ongoing Monitoring and Call Traffic Analysis

Amiba Inc actively monitors network traffic to detect abnormal or high-risk calling patterns, including: - High-volume short-duration call spikes.

- Mismatched or invalid caller ID information.
- Traffic from newly onboarded or previously flagged customers.

Internal automated analytics and third-party reputation data (e.g., **Sansay**) are used to identify and investigate suspicious activity.

When suspect traffic is detected:

1. Calls are flagged and temporarily blocked if needed.
2. Customers are notified and must provide call records or proof of consent.
3. Accounts are suspended or terminated for confirmed violations.

6. DNO (Do-Not-Originate) and Invalid Number Protections

Amiba Inc maintains and enforces a Do-Not-Originate (DNO) policy using a national Do-Not-Originate List. The company blocks calls that originate from: - Telephone numbers that are unallocated, invalid, or unused.

- Numbers designated as government or public safety numbers.
- Numbers identified through industry traceback or regulatory notice as high-risk.
- Numbers reported as spoofed or used in illegal robocall campaigns.

Amiba Inc incorporates internal controls and third-party data sources to prevent the origination of calls using unauthorized, spoofed, or invalid caller ID information. DNO lists are reviewed and updated regularly as part of the company's ongoing robocall mitigation efforts.

7. Enforcement and Remediation

If a customer or partner is found to be originating unlawful robocalls: - Immediate suspension or disconnection of service occurs.

- Reports are filed with **U.S. traceback consortiums (USTelecom)** and **law enforcement** as appropriate.
- Affected numbering resources are quarantined to prevent re-use.
- Internal incident reports are logged and retained for regulatory review.

8. Cooperation with Enforcement and Industry Initiatives

Amiba Inc fully cooperates with: - The **FCC** and **FTC** in any enforcement action.

- The **Industry Traceback Group (ITG)** for traceback request response within 24 hours.
- Other carriers and industry working groups to share threat intelligence and mitigation best practices.

9. Point of Contact for Robocall Mitigation

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