

FIBERMAX TELECOM SAC

ROBOCALL MITIGATION PROGRAM

March 2024

Consistent with this FCC regulations and its “Best Practices” guidance, this Robocall Mitigation Plan (RMP) details the policies and procedures that FIBERMAX TELCOM SAC established to avoid, the origination, carrying, or processing of illegal robocall traffic as part of its robocall mitigation program to prevent unlawful robocalls from originating on, terminating to, or routing through our network.

FIBERMAX TELECOM SAC is a non-gateway intermediate provider that focuses its business and operations on the enterprise customer segments of the voice services communications market.

FIBERMAX TELECOM SAC provides International and Domestic Long-Distance voice termination in the ILD Wholesale market through tis variety of interconnections with telecommunications carriers, PSTNs, Mobile Operators, Mobile Virtual Network Operators (MVNOs), Long Distance Operators and Long-Distance Wholesales Carriers supplying international connectivity and call transit worldwide.

ROBOCALL MITIGATION PLAN

The following RMP describes FIBERMAX TELECOM SAC affirmative and effective measures to prevent customers from originating illegal robocalls:

(A) AFFIRMATIVE, EFFECTIVE MEASURES TO PREVENT CUSTOMERS FROM ORIGINATING ILLEGAL ROBOCALLS

a Call Authentication Mechanism

Being a foreign entity FIBERMAX TELECOM SAC has not implemented STIR/SHAKEN protocols for call authentication. Despite this, we guarantee that our providers for the US market are listed and have already implemented a full STIR/SHAKEN protocol.

b Know-your-Upstream Provider Protocol

FIBERMAX TELECOM SAC has implemented appropriate Know Your Customer (KYC) protocols when onboarding new customers.

As part of its customer-onboarding process, FIBERMAX TELECOM SAC implements several measures to confirm the identity and relevant business practices of a potential customer before entering into a formal agreement with them. This KYC Protocol outlines the procedures for collecting and verifying customer information to ensure compliance with regulatory standards and mitigate risks associated with new and existing customers.

All prospective customers must complete the following a KYC Protocol which provides FIBERMAX TELECOM SAC with detailed background, business, and regulatory compliance details, as well as customer references about the potential customer:

- i **KYC Form Submission:** Customers are required to complete and submit a KYC Form containing the following information. Failure to comply with KYC requirements may result in delays or rejection of the interconnection request.

The KYC Form must be filled out in its entirety for acceptance and will contain detailed information about the business operation, purpose, activities and regulatory compliance.

By submitting the KYC Form and associated documents, clients acknowledge their understanding and agreement to comply with the requirements outlined in this KYC Form.

- ii **KYC Form Validation Process:** Upon receipt of the required information in the KYC Form, the compliance office conducts a validation process to ensure the accuracy of the information provided by the Customer. The validation process includes:

- Reviewing the client's website, social media profiles, and LinkedIn profile.
- Verifying the validity of provided phone numbers.
- Confirming the authenticity of FCC 499 Filing and FCC registration numbers.
- Checking for registration in the Robocall Mitigation Database (RMD).
- Customer's provided information is cross-checked for consistency with the data uploaded in the Robocall Mitigation Database.

- iii **Record Keeping:** The compliance office maintains records of all KYC Forms, validation processes, and KYC Protocols for auditing and regulatory purposes.

c **Only Accepting Traffic from Providers in the RMD**

FIBERMAX TELECOM SAC only accepts calls from Providers listed in the RMD:

- **Domestic Voice Service Providers:** FIBERMAX TELECOM SAC solely accepts calls from domestic Voice Service Providers if the provider's filing is listed

in the RMD and has not been subject to delisting due to enforcement actions.

- ***Foreign Voice Service Providers and Foreign Intermediate Providers:*** FIBERMAX TELECOM SAC only accepts calls from Foreign Voice Service Providers or Foreign Intermediate Providers utilizing North American Numbering Plan upon the provider's inclusion in the RMD and absence of delisting due to enforcement actions.
- ***Gateway Providers:*** FIBERMAX TELECOM SAC will only accept calls directly from Gateway Providers if the provider's filing: (a) is listed in the RMD, (b) demonstrates affirmative submission of the filing, and (c) has not undergone delisting due to enforcement actions.

d Contractual Provisions to Mitigate Illegal Robocalls

As part of the onboarding process for new clients sending traffic to the USA, FIBERMAX TELECOM SAC requires the execution of an Interconnection Agreement, to which an addendum is appended, including terms and conditions that obligate customers not to use FIBERMAX TELECOM SAC services for unlawful purposes; and preserve the right to terminate customers for violations of the law.

e Proactive Network Monitoring

FIBERMAX TELECOM SAC has various monitoring and reporting systems in place to analyze traffic on its network for potentially suspicious traffic patterns that are likely to be associated with illegal robocalls or other potentially unlawful usage. If FIBERMAX TELECOM SAC detects a pattern consistent with illegal robocalls or has reason to suspect illegal robocalling or spoofing is occurring on its network, FIBERMAX TELECOM SAC takes prompt action to identify the party that is using its network to carry these calls and take appropriate action. Once suspected unlawful traffic is discovered, FIBERMAX TELECOM SAC blocks any further traffic from being carried associated with the Media IP address of that suspicious traffic.

(B) TRACEBACK PROCESS AND BEST PRACTICES

Following USTelecom's Traceback Process and "Best Practices", FIBERMAX TELECOM SAC diligently follows established protocols to address and respond to traceback requests. These practices emphasize the importance of prompt and thorough cooperation in identifying the origins of illegal robocalls and taking appropriate action to mitigate their impact. By adhering to these industry standards, we demonstrate our commitment to combating unlawful telecommunications activities and upholding the integrity of our services. Our adherence to these following best practices ensures effective collaboration with industry stakeholders and regulatory authorities in combating the scourge of illegal robocalls, thereby enhancing trust and reliability within the telecommunications ecosystem:

- a. **24 Hours response:** FIBERMAX TELECOM SAC commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities to investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocall, in accordance with applicable laws.
- b. **Dedicated Point of Contact:** FIBERMAX TELECOM SAC has designated a dedicated point of contact for addressing requests related to Suspicious Traffic. This person will be the Robocall Compliance Manager and will oversee all matters regarding robocall mitigation actions.
- c. **Ongoing Coordination:** FIBERMAX TELECOM SAC will exchange information regarding suspicious traffic with other partners and the USTelecom through email, phone calls, etc.