

Compliance Policies & Mitigation Plan under law and rules of:

Telephone Consumer Protection Act - 47 U.S.C. § 227 et. seq.; Telephone Robocall Abuse Criminal Enforcement and Deterrence Act of 2019(PalloneThune TRACED Act) amending .; Do-Not-Call Implementation Act of 2003 – 15 U.S.C § 6101 et. seq.

ADOPTED AND REVISED BY

O11 Telecom, LLC

CORES/FRN: **0034607606**
FCC 499-A ID: **836530** (I-VoIP/NonI-VoIP/Other Toll) ¹
RMD No,: **00015669** ²

DATE: February 22, 2026

¹ [FCC Form 499 Filer Database Detailed Information](#)

² [Robocall Mitigation Database Form - Robocall Mitigation Database \(servicenowservices.com\)](#)

LIMITATIONS IN SCOPE OF SERVICE

011 Telecom LLC (“011 Telecom”) competitive small sized provider of primarily international services with limited interstate call routing services within the U.S. 011 Telecom has a wholesale VoIP routing line of business that primarily focuses on point-to-point international services; however, resale services can include occasional calls to the United States, calls within the United State, and calls from the United States to other international points. Approximately 90% of all such calls are purely outside the United State, with a small proportion comprising routing of calls domestically within the continental US. 011 Telecom transacts a limited amount of U.S. interstate resale traffic. This policy is applicable to the portion of business which may be deemed intermediate provider voice services.

We perform the following role in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation acting as a wholesale provider.
- Our next hop carrier is Red Telecom LLC.

The reasonable measures undertaken by 011 Telecom on particular calls are performed in real time vs based upon information that comes to the attention of 011 Telecom through the FCC’s delegated ITG Consortium, the federal Do Not Call Registry of the FTC, Numbers that do not correspond as duly authorized by the North American Numbering Plan, Spoofed numbers of an agency or law enforcement agency to which a subpoena had been issued, and other Providers that have received Traceback requests and have informed 011 Telecom as an intermediate provider in the call path. 011 Telecom possesses no media boards within its networks for the United States to have access to call content. When providing resale traffic, 011 Telecom does not originate or terminate calls to have full view of the call path or purpose.

Indication of a violative robocall is thus limited in the position that 011 Telecom exists in the call path and transmission information alone may not be enough to make a reasonable real time determination without further verifiable secondary sources.

011 Telecom blocks short duration call traffic from foreign originating on U.S. called numbers to numbers on the FTC DNC and FCC DNO Registries. For short duration call traffic from foreign origination to U.S. called numbers NOT on the FTC DNC Registry, 011 Telecom must rely on verifiable secondary sources for transmission purposes. This may include but is not limited to traceback requests indicating a prior fraudulent purpose call (attempt to criminally defraud a called party of property or money with intent or by fraudulent means including threat, theft, or impersonation) from the originating number, Know Your Client Information it retains or other information to the same effect from law enforcement agencies indicating fraudulent purpose calls, be it an individual call or calls in mass.

The policies and protocols established by this policy to block unlawful or illegal robocalls weigh into consideration the reasonable information available, from transmission information and verifiable secondary sources at any given period. The policies and protocols established by this policy weigh into consideration adopted Rules by the FCC over Intermediate Voice Providers.

ADOPTED POLICY:

011 Telecom is a domestic Interconnected and Non-Interconnected VoIP provider that also sells Other toll services and has registered for blanket domestic authority with the Federal Communications Commission (FCC) under its FCC 499-A Filer ID and is voice service provider as defined under amendments to the Federal Communications Act of

1934, as amended, and further amended by 47 U.S.C. § 227 et. seq (TRACED Act), generally, and under rules and orders promulgated by the FCC. Due to the nature of voice service traffic that 011 Telecom routes, it is an intermediate provider under the TRACED Act. The nature of 011 Telecom' voice resale services are wholesale resale of call termination to all points, including occasional U.S. points. This is primarily via VoIP/SIP routing. These policies are applicable to the termination of calls routed by 011 Telecom and its role as an intermediate resale voice service provider. 011 Telecom adopts the identification and requirements of an **Intermediate Voice Service Provider** under the Act for all its U.S. domestic call termination services based upon the services it offers.³

Under the TRACED Act, The FCC has promulgated rules and orders applicable to intermediate providers, such as 011 Telecom. The following policies apply to the compliance of 011 Telecom with those rules in the rendering of its services and its responsiveness to mitigating illegal or unlawful suspected robocalls. 011 Telecom has no technical means to have Privy to the call content of any suspected roll calls. 011 Telecom' s mitigation protocol is based upon reasonable mitigation methods either authorized by the FCC or otherwise in the custom and practice of identifying robocalls through trace backs requested from the FCC's Industry Traceback Group.

Pursuant to FCC rules in orders, 011 Telecom first registered itself on the FCC's Robocall Mitigation Database⁴ as follows on March 14, 2022.⁵

³A company is a gateway provider if it is a U.S.-based intermediate provider that receives a call directly from a foreign originating provider or foreign intermediate provider at its U.S.-based facilities before transmitting the call downstream to another U.S.-based provider. See 47 CFR § 64.1200(f)(19). "U.S.-based" means that the provider has facilities located in the United States, including a point of presence capable of processing the call. "Receives a call directly" from a provider means the foreign provider directly upstream of the gateway provider in the call path sent the call to the gateway provider, with no providers in-between. 011 Telecom does not provide this function.

⁴[Robocall Mitigation Database Opens; Filing Instructions and Deadlines | Federal Communications Commission \(fcc.gov\)](#)

⁵[Robocall Mitigation Database Form - Robocall Mitigation Database \(servicenowservices.com\)](#)

011 TELECOM, LLC.	U.S. Jurisdiction
Intermediate Provider Token ID for C level attestation	RMD Number: RMD0004885 Available upon Request to 011 (Public Record Version of Policy)

The following measures have been implemented by 011 Telecom pursuant to the prescribed effective dates of FCC Rules:

- **011 Telecom dedicated ITG Traceback Response Employee.** 011 Telecom maintains technical and administrative staff available to respond to FCC's Industry Traceback Group. This is the contact person named in the RMD. Staff has access to its Network and customer contracts, KYC information and access to the ITG portal dashboard for Traceback requests and responses. 011 Telecom Staff maintained is at a minimal number of one staffer with this policy due to its size and telecom business. This is an employee of 011 Telecom, not contractors.
- **Calling Number Verification & Anti-Spoofing.** 011 Telecom performs vetting incoming call traffic that touches its network by maintaining a database within its network platform. This database is outsourced from its virtual platform provider and undated regularly. The DNO listing is compiled from two sources of DNO numbers. The lists are vetted to cross reference duplicate calling numbers and are cross referenced with reported Tracebacks received of suspected robocalling numbers.
- **Calling Number Verification & Anti-Spoofing.** 011 Telecom conducts ANI confirmation for validation of numbers within the North American Numbering Plan through its Platform Provider as a measure to detect call spoofing or Pseudo ANI. Pseudo ANI's are generally blocked by 011 Telecom.
- **Do-Not-Call (DNC) Blocking.** 011 Telecom performs vetting incoming call traffic that touches its network through its Platform Provider with calling numbers listed on the Federal Trade Commission's DNC list directly or via third-party vendors of affiliates who blend these lists into prohibited dialed numbers. The list is updated quarterly.
- **STIR/SHAKEN Tokenization.** 011 Telecom has registered with the STI-PA using OCN 905K. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls

we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.

- **Traffic Monitoring of Short Duration calls and anomalies.** 011 Telecom maintains traffic measures that are either physically monitored by staff or automated in near to real time for short duration calls, frequency, calling party number, and transmitting provider. Anomalous traffic patterns or traffic increase of short duration calls not indicative of conversational traffic is flagged and customer is questioned on the nature of traffic and traffic source as a preliminary warning to any future call blocking.
- **Call Blocking.** 011 Telecom blocks the calling number and/or truck attributable to a suspected robocall for which it receives an ITG traceback request. To date, it has received none from the ITG. The protocol is that the customer is informed of the issue at the time, and 011 Telecom seeks further information on the call and 011 Telecom reserves the contractual right to block and suspend customer accounts, for cause, with provider that transmit more than three (3) calls that result in Traceback requests within a 48-hour consecutive period, or more than three (3) independent Traceback requests within any given calendar month. Final review of customer suspension or termination is based upon business decision and further information found on the customer's KYC contact form, or otherwise provided by the customer after further inquiry by 011 Telecom.

MINIMAL TRACED ACT REQUIREMENTS OF 011 TELECOM:

- I. Policy regarding **47 CFR § 64.1200**, as amended by 2023 (Delivery restrictions); AND Federal Communication Commission's *Sixth Report And Order In Cg Docket No. 17-59*, *Fifth Report And Order In WC Docket No. 17-97*, *Order On Reconsideration In WC Docket No. 17-97*, *Order, Seventh Further Notice Of Proposed Rulemaking In CG Docket No. 17-59*, And *Fifth Further Notice Of Proposed Rulemaking In WC Docket No. 17-97* (Issued May 20, 2022).

011 Telecom has implemented "Know Your Customer" (KYC) contact forms and traffic monitoring processes to mitigate the risk that it may inadvertently process or route illegal robocalls on behalf of its customers. Contact forms are acquired from all Voice and Intermediate Providers upon contract, or upon request, as a part of 011 Telecom's onboarding of the customer. Existing clients have been secured from respective providers. Contact information is updated annually, or upon demand of 011 Telecom. See, Exhibit A

for ***Sample form of KYC Form.*** As of the date of this policy, the response time by 011 Telecom to any trace back received from with the FCC's Industry Traceback Group is less than 24 hours from first receipt by the company.

a. STIR/SHAKEN Compliance.

011 Telecom has commenced implementation of attestation level C (Gateway) as a voice service provider for its U.S. terminating portion of traffic pursuant to 47 C.F.R. § 64.6301 et. seq. This level of attestation is accomplished via TOKEN on all voice data trunks and calls. Under this attestation level, The call is received from an authorized party, but 011 Telecom cannot at all times authenticate the call source (originating Provider) received into its network as the call was received from other provider closer to the originating source of the suspected robocall. 011 Telecom shall have STIR/SHAKEN protocol fully deployed under attestation level C on or before June 30, 2024.

011 Telecom has commenced implementation attestation level C (Gateway) under STIR/SHAKEN protocol in combination with the following reasonable mitigation protocols: as an intermediate voice service provider in furtherance of Know Your Customer (FCC R&O NFPRM FCC 22-37) and STIR/SHAKEN (47 C.F.R. § 64.6301 et. seq.) obligations. Token is to be inserted **on all** U.S. domestic interstate calls routed for resale termination by 011 Telecom.

b. TRACEBAK Requests from ITG.

i. **Responsiveness to ITG Tracebacks.**

- ii. 011 Telecom acknowledges that one (1) Traceback of suspected robocall may represent multiple calls being introduced into the call

flow that are violative of the TCPA.⁶ 011 Telecom takes every traceback request from the ITG seriously. The mere presence of one trace back, or one call violative of the TCPA, has legal standing for enforcement by the FCC or through the courts. With a policy of best practices, every Traceback Request of a suspected robocall violative of the Federal Communications Act (FCA) will be treated as serious and result in the immediate blocking of that number, contact with the upstream customer, and addition of the number to standing DNA lists maintained by 011 Telecom.

iii. **Minimal Response Times.**

Upon receipt of a traceback request from the Commission, civil law enforcement, criminal law enforcement, or the industry traceback consortium: 011 TELECOM (when acting as Intermediate Provider) shall respond to the traceback request concerning a suspected illegal or unlawful robocall **within 24 hours**. In accordance with 47 C.F.R. § 64.1200 (c) (2)(I)(n)(11), and at a maximum, this 24-hour clock for 011 TELECOM will not start outside of business hours, and requests received during that time are deemed received at 8 a.m. on

the next business day. Should the 24-hour response period end on a non-business day, either a weekend or a Federal legal holiday, the

⁶See, *Drazen v. Pinto*, No. 21-10199, 2023 WL 4699939 (11th Cir. July 24, 2023).

24-hour clock does not run for the weekend or holiday in question and restarts at 12:01 a.m. on the next business day following when the request would otherwise be due. *(For example, a request received at 3 p.m. on a Friday will be returned before 3 p.m. on the following Monday, assuming that Monday is not a Federal legal holiday.)* Business days are deemed to be Monday through Friday, excluding Federal legal holidays, and business hours is deemed to be 8 a.m. to 5:30 p.m. Eastern Time. on any business day. 47 C.F.R. § 64.1200 (c) (2)(I)(n)(11).

iv. Complete Information logged within ITG Portal.

011 Telecom has trained its staff person on accessing and providing information buying through the ITG portal in regard to all trace back request received. Complete information to the best of 011 Telecom's KYC contact form, billing records and correspondence with the upstream provider customer shall be logged into the ITG portal based upon the particular request of the ITG. 011 Telecom Shall not at any time withhold information that is readily available from disclosure through the portal. Special request by the ITG for information beyond the purpose of a traceback "hop" will be handled on a case-by-case basis. Complete disclosure shall comprise disclosure of transmitting call information between any of 011 Telecom's upstream customers, 011 Telecom, and the downstream provider to which 011 Telecom transmitted the call. 011 Telecom

shall also identify that the calls it transmitted contained its token and confirm the TOKEN and Company ID with the ITG.

v. Procedures upon Traceback Request

Upon receipt of a Traceback Request, 011 Telecom shall perform and adhere to the following as appropriate:

1. Promptly investigate each transmission identified by the ITG in the Traceback Request
2. If necessary, effectively mitigating the identified unlawful traffic by determining the source of the traffic and preventing that source from continuing to originate such traffic. This may involve one of three measures:
 - a. **Block Customer traffic.** Block Call Traffic from the voice service provider subject of the Traceback Request.
 - b. **Suspend Customer.** Suspend the Access to 011 Telecom's network by the subject voice service provider of the Traceback Request. This measure is reserved for repeated traceback requests within a short period of time not exceeding 48 hours, or if reoccurrence of Traceback Requests happens on an individual basis more than three times within any given calendar month.

c. **Terminate Customer.** Terminate dealings with the voice service provide subject of the Traceback Request upon further occurrence within 48 hours of receipt of the Traceback Request(s). This action is reserved for repeated Traceback Requests from the same provider after 011 TELECOM has communicated with provider about the traffic and has been given assurances that it will not happen, but nonetheless trace back requests continue.

c. **Compliance with 47 CFR 64.1200(k)(4) “FCC K4 Notice.”**

011 Telecom, as an Intermediate Provider, recognizes that pursuant to 47 U.S.C. § 227 et. seq the FCC may determine certain originating, intermediate or gateway providers to be violative of the TRACED Act and send Notice to all voice service providers as prescribed by 47 CFR 64.1200(k)(4). It is understood that this notice is a notice to all voice service providers like 011 Telecom to take immediate action with regard to the target provider and any traffic it sends to other voice service providers terminating calls within the United States. Public notice and copies of the FCC K4 Notice will be published by the FCC on its website and generally circulated through the Industry Traceback Group to warn the industry that it has made an initial determination that traffic passed from these providers is violative of the Federal Communication Act. 011 Telecom upon such notice being made public shall immediately take the following actions with

regard to the subject provider until final resolution or determination is made in the matter.

1. **Call Blocking:** Block upstream traffic from “Bad Actors” (including known affiliate or sister companies providing voice service call termination into the U.S.) from passing through 011 Telecom’s network. *011 Telecom shall inform the customer in writing This action being taken and sight the FCC K-4 Notice as reasonable cause for this action.*
2. **Customer Access suspension.** Immediately suspend the account of the suspected “Bad Actor” until final determination or resolution of the matter is authorized by the Commission. *011 Telecom shall inform the customer in writing This action being taken and sight the FCC K-4 Notice as reasonable cause for this action.*
3. **Termination of Customer Account.** Upon reliable information made public by the FCC, 011 Telecom reserves the sole right determinate the account of the customer target of the FCC K-4 Notice. *011 Telecom shall inform the customer in writing This action being taken and sight the FCC K-4 Notice as reasonable cause for this action.*

II. Compliance with Do-Not-Call Implementation Act of 2003, 15 U.S.C § 6101 et. seq., and use of Do Not Originate (DNO) databases as an Intermediate voice service provider.

011 Telecom acknowledges that in its role as a voice service provider it does not have contractual privity with the calling party for any “commercial telephone call” that passes through its network. 011 Telecom further acknowledges that called parties within the United States may register themselves and the Federal Trade Commission’s Do-Not-Call Registry to prohibit unwanted telephone sales solicitation and telemarketing via and through their subscriber number.

As reasonable compliance with the Do-Not-Call Implementation Act of 2003 (“DNC”), 011 Telecom has elected to database and vet numbers found on the Do-Not-Call Registry as subscribed historically by its platform provider who subscribes to the DoNot-Call Registry and includes these telephone numbers with blocked DNO telephone numbers within its Platform that manages 011 Telecom’s network and reasonably adds these numbers to calls blocked by 011 Telecom.

As reasonable compliance with the TRACED Act and the Commission's Rules, 011 Telecom has elected to database and vet numbers found on the Do-Not-Originate (DNO) databases of previously identified illegal robocallers or suspicious illegal robocall traceback requests. 011 Telecom treats the DNC and DNO equally for purposes of vetting suspected numbers of robocallers.

III. Errors Occurring Under This Policy

Should an error in the performance of 011 Telecom written policies occur, 011 Telecom shall investigate the cause of the error and if within the control of 011 Telecom for corrective action. Such investigation shall determine whether the cause was technical or do to human error and take remedial action to correct any technical problem and further educate any staff on the compliance requirements under this policy and under the

Telephone Consumer Protection Act. Telephone Robocall Abuse Criminal Enforcement and Deterrence Act of 2019, and the federal Do-Not-Call Implementation Act of 2003.

This Revised Policy is hereby authorized for Public Record publication on RMD by:

/s/ Marcelo Licht /s/ (Public Record Signature Version)
Mr. Marcelo Licht, Manager and ITG Contact of
o11 Telecom, LLC (Florida)

Date: April 22, 2024

COMPLIANCE POLICIES & MITIGATION PLAN
EXHIBIT A

SAMPLE KYC Form (subject to change based upon business and provider, but minimally includes the following:

Customer Legal Name			
DBA/Trade Name			
Previous Name:			
Federal Tax ID N° (FEIN) or foreign business license:			
State of Incorporation:		Years Incorporated:	Years In Business:
Entity Type		☐ Corp. ☐ Individual ☐ Partnership ☐ LLC ☐ Other:	
Type of Business		☐ Wholesale; ☐ Retail; ☐ Both, Provide Percent of Mix: Wholesale __% Resale __% Origination __%	
Business Description (Top 3 service types)		☐ Interconnected VoIP (Hosted IP-PBX) ☐ Non-Interconnected VoIP ☐ Other Toll ☐ Private Service Provider ☐ Toll Reseller ☐ Interexchange Carrier ☐ Cellular/PCS/SMR ☐ Other Mobile ☐ ☐ Call/Contact Center ☐ Audio Bridging (teleconferencing) Provider ☐ Other (please describe):	
Address (Corporate Headquarters or Main Location)			
Address 1:			
City:		State:	Zip Code:
Main Number:	Fax Number:	Website URL:	Social Media Address:
Billing Address ☐ <i>check if same as above</i>			
City:		State:	Zip Code:
FCC (FRN):			
FCC 499 File ID		FCC Registration Name (if differs from Customer Name)	
USF Exempt: ☐ YES ☐ NO		Name of Entity w/499 Filer ID (if differs from Company Name)	
Are you a member of the US TELECOM & industry traceback group (ITG)?		☐ YES ☐ NO	
Do you actively participate in the ITG tracebacks process within 24 hours?		☐ YES ☐ NO	
Are you registered in the FCC's robocalling mitigations database (RMR)?		☐ YES ☐ NO	
If not, why or state when do your plan to register?			
Have you implemented STIR/SHAKEN Tokens in your network?		☐ YES ☐ NO	
If not, why not?			
Do you have a written Robocalling mitigation plan in place to combat illegal Robocalling, including customer vetting and telephone number validation?		☐ YES ☐ NO	

Do you have or utilize STIR/SHAKEN Tokens to ID your calls and services ☐ YES ☐ NO		
BILLING & CDR CONTACT PERSON		
Name:	Phone:	Email:
CALEA & ROBOCALL - LEGAL COMPLIANCE		
Technical Contact Person & Address:	24/7 Telephone #:	
24/7 Email:		
OPERATION/NETWORK CONTACT TO ADDRESS TRAFFIC COMPLAINTS		
Name:	Phone:	Email:
Do you block spoofed or fraudulent calls? ☐ NO ☐ YES		
Describe types of businesses customers served (e.g., Conference Calling, Call Center, International, Enterprise, Small and medium enterprises, wireless carriers, Hosted PBX, other (please specify):		
Do you or your customers engage in Telemarketing? ☐ NO ☐ YES If yes, please describe.		
Do you or your customers generated autodialed traffic of ADTS or predative dialer)? ☐ NO ☐ YES (use If yes, please describe.		
Do you have a Subscription Account Number for accessing the National Do Not Call Registry? ☐ NO ☐ YES, please provide Account Number: If not, do you use a third-party service that subscribes to the DNC List and vets for you: please provide Name and Account Number of third-party service:		
Does your customer use prerecorded calls? ☐ NO ☐ YES		
Do you block spoofed or fraudulent calls? ☐ NO ☐ YES		

This Form of the Company is hereby authorized for Public Record publication on FCC

RMD for 011 Telecom by:

/s/ Marcelo Licht /s/ (Public Record Signature Version)

Mr. Marcelo Licht, Manager and ITG Contact of
011 Telecom, LLC (Florida)

Date: February 22, 2026