



MITIGATION PLAN

AovataTalk Communications LLC

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OCN 333K

Pursuant to 47 C.F.R. § 64.6305 AovataTalk Communications LLC submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. This report describes the status of its implementation of STIR/SHAKEN and the practices and procedures AovataTalk Communications LLC (hereinafter also referred to as "The Company") has in place to mitigate illegal robocalls as of **February 19, 2026**. The Company may modify, add, delete or otherwise alter any of the policies and procedures described in the plan at any time to respond to changes in its business, its capabilities and its needs.

As of April 1, 2024, AovataTalk Communications LLC role in the network is a **Voice Service Provider providing service to end-users**. We have registered with the STI-PA using **OCN 333K**. We have our own STIR/SHAKEN certificate issued by **[REDACTED]** (STI-CA) that we use when authenticating calls we originate.

AovataTalk Communications LLC is judiciously working to prevent unlawful robocalls from originating on its network while in the process of installing the new STIR/SHAKEN authentication architecture. In the meantime, the Company has implemented the following robocall mitigation plan to address unlawful robocall traffic.

AovataTalk Communications LLC has enforceable terms of use and/or an acceptable use policy noted in its contracts. These policies define the circumstances by which the company will deny, suspend, or terminate service to a customer. We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

The Company confirms that the upstream providers have a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider. We have been informed of the upstream providers "Know-Your-Customer" guidelines and have provided them with the necessary KYC documentation they've requested that we complete.

Aovataalk Communications LLC upstream providers are;

[REDACTED]

Aovataalk Communications LLC follows the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group. This process includes the collection and review of entity-identifying information to confirm that Aovataalk Communications LLC has an authenticated relationship with the customer. The Company uses this authenticated information to determine whether the customer is subject to any enforcement actions that restrict the type of calling that they may do, for example, if they have been banned from initiating telemarketing calls.

Aovataalk Communications LLC also thoroughly vets all customers utilizing our proprietary dialer and VoIP services by [REDACTED]. The company also requires customers to use our dialing and VOiP service.

Aovataalk Communications LLC contractual provisions with customers prohibit them from initiating illegal robocalls. If the Company discovers a customer is initiating suspicious robocalls, it warns them to stop. If such traffic continues, then the Company terminates their service.

Aovataalk Communications LLC requires that upstream providers have a reasonable Robocall Mitigation Plan, including a vetting process for their customers as well as their upstream providers, and that they use call analytics to identify suspicious traffic prior to installing services for new customers. Aovataalk Communications LLC takes the following measures to weed out end users that could potentially generate robocall traffic:

The Company uses a KYCs to confirm the following information for its customers:
[REDACTED]

When the customer is a business, Aovataalk Communications LLC also requires Business Incorporation Documents and verifies they have a reputation as a valid business that abides by the law.

Aovataalk Communications LLC uses [REDACTED].

The software provides detailed reporting to identify suspected illegal robocalls. The system alerts us if we process outbound calls where the calling number has a poor reputation or is invalid, unallocated, or on a Do Not Originate list. The Company will immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If the Company determines that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

Aovataalk Communications LLC will comply fully with all conditions set forth by the FCC, as well as with the Commission's rules and policies more generally.

Aovataalk Communications LLC has designated an individual as a dedicated point of contact for addressing traceback requests from the registered traceback consortium (the Industry Traceback Group, "ITG"), the Federal Communications Commission ("FCC"), and law enforcement. Aovataalk Communications LLC has provided the ITG with current contact information and business hours for this point of contact, or will do so upon receipt of its first traceback request. Aovataalk Communications LLC will respond promptly to ITG inquiries and will respond within 24 hours to all traceback requests from the ITG, the FCC, and law enforcement. If a traceback indicates suspicious or potentially unlawful calling activity, Aovataalk Communications LLC will take appropriate mitigation action, which may include investigation, suspension, blocking, and/or termination of the responsible customer or traffic, consistent with applicable law and the Company's contractual rights. Aovataalk Communications LLC will also provide law enforcement and regulatory agencies with relevant non-proprietary information in response to reasonable and legitimate requests concerning suspected illegal robocalls and related suspicious activity, and will implement required robocall mitigation measures to the fullest extent practicable with the goal of maximizing mitigation of illegal robocalls.

Aovataalk Communications LLC performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call.

Aovataalk Communications LLC does not wish to publicize any private and/or classified information that has the potential to expose the Company to fraud and/or anti-competitive actions. Therefore, the Company will submit a redacted version for the public site and requests that the FCC keep the unredacted version CONFIDENTIAL.
