



Robocall Mitigation Plan for Paradise Mobile

Executive Summary

Paradise Mobile, a new telecommunications operator based in Bermuda, has recently launched its 5G and Voice over LTE (VoLTE) services. As a provider outside the United States, Paradise Mobile is exempt from complying with the U.S. Federal Communications Commission's (FCC) STIR/SHAKEN implementation requirements, as outlined under 47 CFR 64.630(e). This document outlines our commitment to combating robocalls through our voluntary participation in international traceback programs and other proactive measures. This document serves as our commitment to fulfilling these efforts.

1. Exemption Justification

Location of Service:

- **Service Area:** Paradise Mobile operates solely within Bermuda, providing high-quality wireless VoLTE and 5G services.
- **Regulatory Environment:** The telecommunications services provided by Paradise Mobile are regulated under Bermuda's local telecommunications regulations, which do not mandate compliance with the U.S. STIR/SHAKEN framework.

Wireless Nature of Service:

- **Technology Deployment:** Our services include the latest technologies, such as VoLTE and 5G, which are inherently wireless and are not specifically required to implement STIR/SHAKEN under the FCC's jurisdiction.

Jurisdictional Scope:

- **Non-U.S. Territory:** Bermuda is not a U.S. territory, and therefore, local providers like Paradise Mobile are not subject to FCC regulations, including those related to STIR/SHAKEN.

2. Voluntary Commitment to Traceback Participation

Despite the exemption, Paradise Mobile is committed to maintaining the integrity of its communications services and protecting its customers from robocall abuses. To this end, we voluntarily participate in the international traceback program designed to identify and mitigate illegal robocall traffic. This commitment underscores our dedication to combating telecommunication fraud and supporting global efforts to ensure consumer protection.



3. Proposed Robocall Mitigation Measures

Customer Identification and Verification:

- Implement robust customer identity verification at the point of service registration to prevent fraudulent accounts.

Network Monitoring and Analytics:

- Deploy advanced call analytics to monitor and analyze call patterns for signs of robocall activity.
- Establish thresholds for abnormal calling activity and automatically block or investigate suspicious calls.

Consumer Awareness and Education:

- Launch educational campaigns to inform customers about robocall risks and preventive measures they can take.
- Provide customers with tools to report suspected robocalls directly through their mobile devices.

Collaboration with International Regulators and Carriers:

- Participate in international forums and working groups dedicated to robocall mitigation.
- Share best practices and data with other carriers and regulators to enhance global robocall mitigation efforts.

Traceback Cooperation:

- Respond promptly to traceback requests from regulators and international law enforcement agencies.
- Provide detailed call origin and path information to assist in identifying and mitigating illegal robocalls.

Conclusion

Paradise Mobile is not required to comply with certain U.S. regulatory requirements like STIR/SHAKEN. However, we are committed to protecting our customers from robocalls and take this responsibility very seriously. We participate voluntarily in the traceback program and have implemented proactive network management practices. By doing so, we strive to set an example for the telecommunications industry in Bermuda. Our goal is to uphold the highest standards of customer protection and service integrity.