

**Marconi Wireless Holdings, LLC
d/b/a CREDO Mobile
Robocall Mitigation Plan**

Document Control

Title	Robocall Mitigation Plan	Document Number	RCM20240201
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Compliance Owner:	CISO	Business Information:	magicJack VoIP Services, LLC 931 Village Blvd, Suite 905, Box 386 West Palm Beach, FL 33409
Audience:	Public		
Operational Scope:	Marconi Wireless Holdings, LLC d/b/a CREDO Mobile	Standard (s) or Framework(s)	Robocall Call Mitigation
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Reviewed By:	Steve Sabados	Last review date	2/18/2026

Review Date

Activity		Date
2/18/2026	Reviewed and updated with 2026 regulatory language	2/18/2026

Document Revisions

Revision Date	Description	Editor	Revision Status (Approved/ In Process)
2/2026	Updated for 2026 rules	Steve Sabados	Approved
2/2024	Document Creation	NA	NA

Summary

Public Notice DA 24-73, released January 25, 2024, announces effective dates and compliance deadlines for revised Robocall Mitigation Database filing requirements and related rules adopted in the Sixth Caller ID Authentication Report and Order, including the additions of and revisions to 47 CFR §§ 64.6303(c), 64.6305(d), 64.6305(e), 64.6305(f), and 64.6305(g).¹ Subsequent FCC guidance, including Public Notice DA 26-72 (released January 22, 2026) and related Federal Register notices, announced additional effective dates and established ongoing RMD obligations, including an annual RMD recertification requirement under 47 CFR § 64.6305(h) (filing window opens February 1, 2026; initial recertification due March 1, 2026; rule effective February 5, 2026) and a CORES information update requirement under 47 CFR § 1.8002(b)(2).

Pursuant to these rules, all providers, regardless of whether they are required to implement STIR/SHAKEN—including all intermediate providers and providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN—are required to file certifications and robocall mitigation plans in the Robocall Mitigation Database and to comply with expanded disclosure requirements for these submissions. Providers newly required to file in the Robocall Mitigation Database were required to submit their initial filings containing all required information and certifications by February 26, 2024. In addition, RMD filers must maintain current and accurate information and complete the FCC's required annual recertification by the applicable deadline (with the first annual recertification due March 1, 2026).

Purpose

Marconi Wireless Holdings, LLC d/b/a CREDO Mobile ("CREDO Mobile") is an MVNO mobile service reseller dedicated to stopping illegal calls from originating in our network and monitoring the calls coming into our network. CREDO Mobile is a reseller, that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, CREDO Mobile is exempt from the FCC's STIR/SHAKEN rules.² The R&O requires that resellers such as CREDO Mobile now file Robocall Mitigation Plans. CREDO Mobile is not a foreign voice service provider.

This document delineates CREDO Mobile's Robocall Mitigation Plan. Because CREDO Mobile does not have access to the necessary infrastructure, it also relies on its upstream carrier to assist in robocall mitigation. As delineated herein, CREDO Mobile works closely with its upstream provider to carry out the required mitigation functions.

Know Your Customer

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with CREDO Mobile in which we send calls on behalf of the subscriber by reselling service bought from our upstream provider.

All new subscribers have their identity confirmed by CREDO Mobile by verifying the subscriber's name, email address, ensuring the validity and location of the email address. All customers are also required to have a wireless service credit check performed to obtain service, requiring a successful score as part of the application package.

Know Your Upstream Provider

CREDO Mobile has a single upstream Tier 1 provider to facilitate all voice traffic originating on or terminating to CREDO Mobile subscribers. The relationship with this established provider involves strong contractual terms.

Acceptable Use Policy

CREDO Mobile maintains an Acceptable Use Policy (“AUP”) that subscribers must agree to before being permitted to use CREDO Mobile's network.³ Among other things, this AUP prohibits CREDO Mobile's customers from:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call
- engaging in “autodialing” and/or “telemarketing”
- engaging in abusive or unsolicited communications, or any other mass, automated voice communications for commercial or marketing purposes
- violating any applicable local, state, or federal law
- violating applicable industry accepted guidelines; and
- using CREDO Mobile's service to engage in or in connection with fraudulent activities.

CREDO Mobile's AUP specifies that CREDO Mobile may act immediately with or without notice if CREDO Mobile, at its sole discretion, believes the customer violated restrictions contained in the AUP.

Mitigation During Service

CREDO Mobile works with its upstream provider to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers.

Analytics for Monitoring Traffic

CREDO Mobile works with its upstream provider to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- anomalies in cost generated by calls from a single customer
- volume of outbound calls and average durations; and
- anomalies in call duration distribution.

Investigate Suspicious Activity

When traffic analysis indicates suspicious activity, CREDO Mobile works with its upstream provider to follow defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends
- checking recent and past account activity and purchases
- contacting the subscriber to understand their particular use case and validate that the activity belongs to that subscriber.

Because CREDO Mobile does not have the infrastructure to implement STIR/SHAKEN, no third party vendors are involved in CREDO Mobile's analytics. CREDO Mobile commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Suspicious Activity Resolution

If CREDO Mobile and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, CREDO Mobile will take appropriate action which may include suspending or terminating the subscriber's use of CREDO Mobile's service.

The name, title, department, business address, telephone number, and email address of the person within CREDO Mobile responsible for addressing robocall mitigation-related issues, to include traceback inquiries from the FCC, the traceback consortium, and law enforcement agencies, is as follows:

Contact Name: Laurie Frank
Contact Title: COO
Contact Street: 931 Village Blvd., Suite 905, Box 386
Contact City: West Palm Beach
Contact State and Zip Code: FL 33409
Contact Telephone Number: 561-290-6001
Contact Email: compliance@credomobile.com

Plan Updates

CREDO Mobile monitors industry best practices and its existing internal processes and may revise this plan where necessary. In the event of any material change to this plan, CREDO Mobile will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Steven Sabados

I, Steven Sabados, Chief Information Security Officer of Marconi Wireless Holdings, LLC d/b/a CREDO Mobil, do hereby certify, under penalty of perjury, the following:

(1) Marconi Wireless Holdings, LLC d/b/a CREDO Mobile ("CREDO Mobile"), by virtue of its status as a reseller does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.

(2) CREDO Mobile's Business name and primary address are as follows:

Marconi Wireless Holdings, LLC
d/b/a CREDO Mobile
931 Village Blvd. Suite 905, Box 386
West Palm Beach, FL 33409

(3) CREDO Mobile has no other business names in use.

(4) CREDO Mobile's role in the call chain is that of a mobile reseller without a STIR/SHAKEN obligation.

(5) All calls CREDO Mobile originates on its network in its capacity as a reseller, are subject to this Robocall Mitigation Plan.

(6) At no time in the prior two years, has CREDO Mobile been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to CREDO Mobile transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.
