

Atlantic Mobile US LLC dba Angel Mobile

Robocall Mitigation Plan

Business Information

Atlantic Mobile US LLC
300 Delaware Avenue
Suite 210, #365
Wilmington, Delaware
19801

STIR/SHAKEN Implementation and Robocall Mitigation Plan

In accordance with 47 CFR § 64.6305, Atlantic Mobile US LLC, presents this report detailing its adherence to the STIR/SHAKEN call authentication framework and outlining its strategies to prevent and address unlawful robocalls. The Atlantic Mobile US LLC retains the prerogative to adjust, append, remove, or otherwise modify any policies and procedures outlined herein at its discretion, in order to align with its business operations, capabilities, requirements, and obligations set forth by the Federal Communications Commission ("FCC").

Atlantic Mobile US LLC Background

Atlantic Mobile US LLC functions as a mobile virtual network operator ("MVNO"), relying on a major carrier's network to provide its services. Consequently, the company lacks complete control over the facilities and network infrastructure essential for implementing the STIR/SHAKEN framework. Specifically, Atlantic Mobile US LLC operates as an Affordable Connectivity Program ("ACP") provider, delivering services in alignment with ACP standards. The company's services target single-line personal use, and, to its knowledge, subscriber devices do not have the capability to initiate a high volume of simultaneous calls. Additionally, Atlantic Mobile US LLC affirms that any device supplied to subscribers is incompatible with automatic dialing systems or software that could facilitate the initiation of illegal robocalls.

Due to these factors, Atlantic Mobile US LLC poses minimal risk of originating illegal or unwanted robocalls. Its services are not conducive to generating a large volume of calls, and the company has tailored its Robocall Mitigation Program accordingly, considering the low risk of illegal robocalls originating on its networks. This plan outlines the reasonable measures Atlantic Mobile US LLC takes in response to the level of risk it faces.

STIR/SHAKEN Implementation and Obligations

Atlantic Mobile US LLC has not instituted the STIR/SHAKEN call authentication framework and faces constraints preventing its implementation. As previously mentioned, being an MVNO, Atlantic Mobile US LLC lacks authority over the essential facilities and network infrastructure required for STIR/SHAKEN implementation. Due to this lack of control, the company is exempt from the FCC's STIR/SHAKEN implementation obligation, as outlined in paragraph 40 of the FCC's First Call Authentication Report and Order. Instead, Atlantic Mobile US LLC relies on its underlying carrier partner, responsible for owning and maintaining the network infrastructure, to carry out and apply STIR/SHAKEN authentication.

In light of the preceding information, Atlantic Mobile US LLC functions in the call chain as a voice service provider without the obligation to implement STIR/SHAKEN.

Atlantic Mobile US LLC Robocall Mitigation Plan

This Robocall Mitigation Plan delineates the specific measures implemented by Atlantic Mobile US LLC to identify and prevent illegal robocalls. Given its role as an MVNO catering to single-line personal use, Atlantic Mobile US LLC is not a significant contributor to the occurrence of illegal robocalls. Nonetheless, the following measures elucidate how the company mitigates and addresses any associated risks. Atlantic Mobile US LLC commits to periodically assess the risks it encounters, the efficacy of its policies and procedures, and its capabilities in supporting the outlined measures. In the event that adjustments are deemed necessary, the company's practices may deviate slightly from those detailed below.

1. Robocall Analytics and Blocking

In its capacity as an MVNO, Atlantic Mobile US LLC depends on its wholesale provider and underlying carrier partner to implement analytics software for the surveillance of call traffic and the blocking of pertinent calls. Atlantic Mobile US LLC does not independently employ any call analytics systems for the identification and prevention of illegal traffic. According to Atlantic Mobile US LLC's understanding, its underlying carrier is responsible for identifying and blocking calls from providers not registered in the Robocall Mitigation Database. As this blocking occurs at the network level, the MVNO lacks control over this process.

2. Ongoing Monitoring

Atlantic Mobile US LLC actively monitors call patterns that could suggest illegal robocalling activities. Upon detecting any such patterns, the company initiates contact with relevant partners to address the issue. These patterns encompass:

- Significant surges of calls within a brief time span;
- Reduced average call duration;
- Diminished call completion ratios; and
- Substantial volumes of complaints associated with a suspicious line.

3. Know-Your-Upstream Provider

Atlantic Mobile US LLC, operating as an MVNO responsible for originating end user calls, does not engage directly with upstream providers. All calls initiated by the company are directed through the network of its underlying carrier.

4. Customer Due Diligence

Atlantic Mobile US LLC collects personal information from each subscriber, ensuring it is sufficient to verify the subscriber's identity and qualification under federal programs for service eligibility. This information serves as a means to identify subscribers in the event of any unlawful activities.

5. Compliance Monitoring

Atlantic Mobile US LLC actively monitors its services to identify violations of its Acceptable Use Policy (AUP). This includes scrutiny for the connection of devices capable of mass dialing numbers or enabling spoofing.

6. Enforcement of Contractual Obligations

Atlantic Mobile US LLC is committed to enforcing its contractual obligations and may suspend or terminate services for subscribers with a track record of noncompliance. This includes breaches related to the acceptable use of service. The company's contracts and policies explicitly prohibit unlawful uses of service and outline provisions for suspension and/or disconnection in case of such violations. In instances where a subscriber is enrolled in the ACP, any suspension or disconnection follows prescribed procedures.

Traceback Requests

In response to Traceback Requests, Atlantic Mobile US LLC adheres to the following best practices to facilitate cooperation with the FCC, law enforcement, and the Industry Traceback Group ("ITG"):

Prompt Investigation and Response

Upon receipt of a traceback request from the FCC, law enforcement, or the ITG, Atlantic Mobile US LLC pledges to fully respond within 24 hours. In cases where a response is not feasible, the company will provide sufficient information explaining the limitation. Atlantic Mobile US LLC will continue to collaborate with these entities to investigate and halt any illegal robocallers attempting to use its service for unlawful calls.

Ongoing Coordination

The company commits to ongoing coordination with the FCC, law enforcement, ITG, and other voice service providers in cases of suspicious traffic. This involves the exchange of information related to such traffic and ad hoc follow-up as deemed appropriate.

Privacy of Traceback Investigations

Atlantic Mobile US LLC commits to maintaining the confidentiality of information pertaining to traceback investigations. Such information will only be shared with the ITG, other providers involved in the traceback investigation, or in compliance with valid legal processes.

Atlantic Mobile US LLC undertakes periodic reviews of traceback request records to identify subscribers subject to repeated inquiries. The company will take appropriate action on a case-specific basis, which may involve collaborating with the subscriber to mitigate illegal traffic, temporary suspension, and/or termination of the subscriber's service. If the subscriber is enrolled in the ACP, any suspension or termination will adhere to the FCC's rules governing this program. Additionally, Atlantic Mobile US LLC keeps comprehensive records of all traceback requests received, including details about the involved parties.

Cooperation with Law Enforcement and State/Federal Regulators

Atlantic Mobile US LLC affirms that it has not been restricted from submitting filings in the Robocall Mitigation Database as a result of law enforcement actions. Additionally, the company is presently not under any formal action or investigation by the Commission, law enforcement agencies, or regulatory bodies due to suspected unlawful robocalling or spoofing, and it has not been subject to such actions in the preceding two years. This status extends to any affiliated entities associated with Atlantic Mobile US LLC. Furthermore, Atlantic Mobile US LLC pledges its commitment to collaborating with state and federal regulators in efforts to prevent any and all illegal robocalls.

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