

Arelion U.S. Inc.

Robocall Mitigation Plan

Arelion U.S. Inc. (“Arelion”) submits this document addressing its plan to prevent and mitigate illegal robocalls. By way of background, Arelion contracts with other carriers for international voice services and does not serve end-users or originate or terminate calls on its network. Arelion does not own or operate voice equipment or a point-of-presence in the United States capable of processing calls and has not implemented STIR/SHAKEN . However, Arelion’s carrier partners block calls that are carrying a +1 U.S. number in the caller ID field and, as a result, Arelion’s service does not include U.S. originated calls.

- **Robocall Mitigation Database.** Arelion has not been prohibited from filing in the Robocall Mitigation Database by the Commission.
- **No Investigation or Action.** Arelion has not 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 transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient program.
- **Cooperation with Traceback.** Arelion is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using Arelion’s services. Arelion will respond in a timely manner to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group (ITG), and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate illegal robocalls.
- **Identifying Information**
 - Primary address of the provider:

Arelion U.S. Inc.
2325 Dulles Corner Boulevard, Suite 550
Herndon, VA 20171
 - Other business names in use: Telia Carrier U.S. Inc. changed its name to Arelion U.S. Inc.
 - All business names previously used: formerly known as Telia Carrier U.S. Inc.
 - Arelion is based in the United States and is a Delaware corporation
 - Individual within company responsible for addressing robocall mitigation-related issues:
 - Tim Hammond, Head of Destination Management
 - Phone: +44 7880 383855
 - tim.hammond@arelion.com

- **Know your customer.** Arelion performs due diligence on its carrier partners, including a credit review to both validate their financial capability and assess their business legitimacy. Arelion also collects information concerning its partners, including banking, registration and tax identification information as well as information concerning the business, such as the address and information on business contacts.
- **Fraud monitoring / mitigation.** As noted, does not own or operate voice equipment or operate a point-of-presence in the United States capable of processing calls. As such, Arelion does not have control over the necessary network infrastructure necessary to implement STIR/SHAKEN. However, Arelion's carrier partners block calls that are carrying a +1 U.S. number in the caller ID field and, as a result, Arelion's service will not include U.S. originated calls. Moreover, Arelion's carrier partners monitor all traffic for indicators of suspicious or fraudulent activity. This includes analyzing suspicious call patterns, including, but not limited to - unusually large number of calls originating from or terminating to the same individual number or range, an excessive number of short duration calls & traffic bursts to / from unusual origins - some of which can, among other things, indicate robocall activity. If indicators of certain activities are detected, , Arelion or its upstream provider(s) will contact the relevant carrier partner to verify the validity of the traffic in question and then take the appropriate follow-up action.
- **Collaboration.** Arelion plays an active role in the international wholesale carrier community, sharing relevant information regarding fraudulent traffic with industry peers and helping to define the best approaches and guidelines for the fight against fraud.
- **Description of Contractual Provisions.** Arelion enters into written agreements with its carrier partners that require compliance with the law and that generally reserve the right for Arelion to cancel and/or temporarily suspend Service if the other Party engages in activities which, in the reasonable opinion of Arelion, are unlawful or may cause disruption or damage to Arelion's network or facilities.
- **Ownership.** Arelion's ownership is detailed on the attached chart.

Arelion Ownership.

