



Phone Number

646-740-0966

ROBOCALL MITIGATION PLAN

Pursuant to 47 C.F.R. § 64.6305 Aertel Limited 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 Aertel Limited (hereinafter also referred to as “The Company”) has in place to mitigate illegal robocalls as of **June 1, 2025**. 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.

Aertel Limited is an affiliate of Xinix, a UK based company. The company has not ever been sold or acquired by another company. Aertel Limited's role in the network is **Non-Gateway Intermediate Provider providing service to wholesale users**. Aertel Limited has a token but does not tokenize calls as they are a Non-Gateway Intermediate provider and only accept pre tokenized calls. Any calls without their own token are rejected.

Aertel Limited is judiciously working to prevent unlawful robocalls from originating on its network while in the process of installing the new STIR/SHAKEN authentication architecture. Aertel Limited ensures rigorous compliance with the STIR/SHAKEN standards and the Pallone-Thune Telecom Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act. The Company has implemented the following robocall mitigation plan to address unlawful robocall traffic.

Aertel Limited 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.

Aertel Limited 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 Aertel Limited 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.

Aertel Limited also validates, when possible, that the entity has a legitimate right to use its asserted calling numbers. The Company uses this information to support the attestation level it assigns to calls that it originates for that customer.

Aertel Limited 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.

Aertel Limited 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, Aertel Limited 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:

- Customer’s identity
- Customer’s right to use the telephone number presented on calls
- Service Address
- Credit History
- Authentic and Legal Campaigns
- 499 Filer ID
- Robocall Mitigation Plan
- FEIN Number
- Customer’s token



Aertel Limited’s contract explicitly prohibits the initiation of illegal robocalls, with immediate termination for non-compliance.

When the customer is a business, Aertel Limited requires Business Incorporation Documents and verifies they have a reputation as a valid business that abides by the law.

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.

Aertel Limited will comply fully with all conditions set forth in the FCC'S 2024 Report and Order mandating the implementation of the STIR/SHAKEN framework, as well as with the Commission's rules and policies more generally.

Aertel Limited has designated an individual as a dedicated point of contact for addressing traceback requests. It either has provided the ITG with the contact information and business hours for those individuals, or will do so upon receipt of the first request from the ITG. See <https://www.ustelecom.org/the-industry-rollback-group-itg/for-providers/>. The Company will respond promptly to inquiries from the Industry Traceback Group (ITG) within 24 hours.

If a pattern of questionable activity is detected Aertel Limited will suspended and/or terminate customer promptly for any tracebacks. Requests from the ITG must be submitted in writing and include the following information:



Company Name:

Company Address:

Requestor's Name:

Requestor's Title:

Requestor's phone number:

Requestor's e-mail:

Aertel Limited will provide valid law enforcement and regulatory agencies with the relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities, and implement mandated Robocall Mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use the Company's service to originate, carry, or process illegal robocalls.

Requests from the valid agency must be submitted in writing and include the following information:

Law Enforcement Agency Name:

Agency Address:

Requestor's Name:

Requestor's Title:

Requestor's phone number:

Requestor's e-mail:



Aertel Limited performs the same mitigation steps for all outbound calls regardless of our role in the call chain for a particular call. The Company has not had any agency action or investigation due to suspected unlawful robocalling or investigations.

Aertel Limited is not subject to any Commission, Law Enforcement, or Regulatory Agency Action or investigation due to suspected unlawful robocalling or spoofing. The Company has had 13 tracebacks and was cleared by the FCC for all.

CONFIDENTIAL DISCLAIMER



Aertel Limited 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.