

Teligentia SA de CV Robocall Mitigation Plan

This robocall Mitigation plan is submitted by Teligentia SA de CV. pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth the Provider’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. The Provider views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps the Provider commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

1. STIR-SHAKEN IMPLEMENTATION STATUS

As indicated in the FCC’s Robocall Mitigation Database, the Provider’s status with respect to STIR-SHAKEN implementation is as follows:

- The filer is a foreign voice service provider not subject to the FCC mandate.

2. TRACEBACK REQUESTS

As noted above, the Provider will cooperate with the FCC, law enforcement and the (ITG) on all traceback requests and investigations. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, the Provider will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback 2 request received within 24 hours after receiving the same.

Within Appendix A to this Plan, the Provider identifies a single point of contact for receiving all traceback requests. As part of its efforts to assist in the successful traceback of illegal robocalls, the Provider will going forward include within its carrier interconnection and/or service agreements language requiring traceback cooperation on any voice service calls exchanged. In part, these related contract provisions will specify the need for parties to promptly identify the upstream provider from which a suspected illegal robocall entered its network or the customer of the service from which the call originated.

3. III. CUSTOMER VETTING PRACTICES

As a means of preventing or minimizing the origination of illegal robocalls through its voice services, the Provider will use best practices in vetting the identity of all of its voice service subscribers, whether a residential or business/commercial subscriber (including any entities that are purchasing the Provider’s services for resale). The subscriber vetting process is intended to

help determine the legitimacy of a customer for the purpose of establishing a service relationship. Generally, the Provider looks to confirm the identify of customers using its voice services through collecting information such as physical customer location, contact person(s), state or country of incorporation, and the nature of the customer's business. Provider efforts to vet retail and business/commercial subscribers occurs during the process of provisioning customer requested services (for example in appropriately sizing the facilities to their claimed intended use), executing the Provider's required service agreements, and granting the customer the right to use telephone number resources. Commercial end users, comprised of larger businesses with more complex service configurations, are generally recognized as presenting a higher risk of perpetrating illegal robocalls and thus those customers, at the Provider's discretion, may be subject to an additional review, including a more stringent background check and possibly a site visit.

Further, with respect to meeting existing obligations to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls, the Provider:

Has established a routine process for monitoring of the usage and quality of its network facilities and conducts recurring and timely reviews of its call detail records (CDRs) to facilitate early identification of unusual or suspicious calling activity or patterns that may indicate use of the network for originating illegal robocalls. In those instances where the Provider identifies activity or a pattern consistent with illegal robocalls the customer will be contacted within twenty-four hours for further investigation and possible action regarding their subscribed to voice service.

Appendix A

Traceback Request Single Point of Contact:

Name: Ivan Ortiz

Title: OPS Manager

Phone Number: 52 555435 7809

Email Address: ivan.ortiz@haz.com.mx

Upstream Provider Information:

Name of Upstream Provider: DIDWW

Nature of Business: DIDWW Ireland Limited

Network Location of Upstream Provider: DIDWW network is distributed over 7 points of presence (POPs) to achieve geo redundancy: New York, Los Angeles, Miami, Germany, Amsterdam, Singapore and Hong Kong.

Name of contact: Ingrida Mikutaityte

Title: Senior Account Manager

Number: 2124611586

Email Address: ingrida.m@didww.com