

Robocall Mitigation Program Description

- **Company Name:** MVT CORP TECNOLOGIA LTDA
- **CNPJ:** 01.811.047/0001-06
- **Address:** Rua Estela 515 - 141h, São Paulo, SP, Brazil
- **Contact Email:** contato@mvtcorp.com.br
- **Contact Phone:** +55 11 5904-9292

1. Exemption Justification

As a foreign entity not operating directly within the United States PSTN, MVT CORP TECNOLOGIA LTDA is exempt from compliance with STIR/SHAKEN under FCC rules. The company does not originate calls directly within the United States and relies on U.S.-based providers for call termination. MVT CORP ensures compliance with robocall mitigation by adhering to alternative measures to prevent illegal robocalls, as described in this document.

2. Robocall Mitigation Measures

MVT CORP TECNOLOGIA LTDA has implemented robust measures to prevent and mitigate fraudulent robocalls. These measures include:

2.1. Customer Verification Procedures

All new customers are subjected to thorough verification:

Verification of valid business registration (CNPJ).

Verification of a legitimate website.

Biometric identity verification at the time of contract signing.

2.2. Call Monitoring and Analysis

Continuous monitoring of call patterns to identify anomalies, such as:

- Low **Answer-Seizure Ratios (ASR)**, which may indicate potential fraud.
- A high volume of unanswered calls or short-duration calls, which could suggest suspicious activity.
- Automatic alerts are generated for any irregular patterns, and services are paused for further investigation if necessary.

2.3. Simultaneous Call Control

Limits are placed on the number of simultaneous calls to prevent misuse by automated systems or robocalls.

Strict policies to prevent the use of auto-dialers or call flooding tools.

2.4. Traffic Management

Real-time analysis of call traffic to block suspicious call spikes.

Implementation of fraud detection algorithms to proactively identify potential abuse.

2.5. Cooperation with Authorities

Full cooperation with traceback requests from U.S. regulatory authorities, industry consortiums, and law enforcement agencies.

Commitment to respond within 24 hours to any request related to fraudulent call traffic.

2.6. Fraud Prevention and Customer Auditing

Periodic auditing of existing customers to ensure compliance with contractual obligations.

Immediate suspension of services for customers found violating anti-fraud policies.

2.7. Transparency and Accountability

Comprehensive logging of call data to maintain a transparent record of all activities.

Regular training for staff to identify and mitigate potential robocall threats.

3. Commitment to Compliance

MVTCORP TECNOLOGIA LTDA is committed to maintaining a secure and reliable telecommunications network. The company ensures that all measures described in this document are strictly enforced and continually updated to align with industry best practices and regulatory requirements.

Marcio Verderio Tahan
CEO