

Robocall Mitigation Program

1. Company Overview

Our company is a **Foreign Voice Service Provider** that does not directly originate or terminate calls to the **United States** or **Canada**. Instead, all U.S.-bound traffic is exclusively routed through **DIDWW Ltd**, a wholesale provider responsible for ensuring **STIR/SHAKEN compliance**.

As a foreign provider without direct access to the **U.S. Public Switched Telephone Network (PSTN)**, we are **not required** to implement **STIR/SHAKEN** ourselves, in accordance with **FCC rule 47 CFR § 64.6304(d)**. However, we are fully committed to mitigating illegal robocalls and ensuring compliance with industry's best practices.

2. Robocall Mitigation Policies & Practices

To prevent the origination of illegal robocalls, we implement **strict customer verification procedures** and adhere to robust fraud prevention measures, including:

- **Customer Vetting & Verification:**
 - We conduct thorough due diligence before onboarding new customers, verifying their identity and business legitimacy.
 - We review traffic patterns to detect anomalies and suspicious activity.
- **Traffic Monitoring & Fraud Prevention:**
 - Our systems continuously monitor call traffic for potential fraud indicators, such as high-volume robocalling patterns.
 - We proactively investigate and take action against any identified fraudulent activities.
- **Collaboration with Partners:**
 - We work closely with **Localphone Ltd**, our wholesale provider, which ensures **STIR/SHAKEN compliance** for all U.S.-bound traffic.
 - We comply with all applicable laws and industry guidelines to prevent illegal robocalling.

3. Compliance with Industry Best Practices

Our company follows the industry's best practices and regulatory guidelines to **minimize the risk of illegal robocalling and spoofing**, including:

- Compliance with international **anti-fraud measures** and **traffic monitoring standards**.
- Implementation of **call authentication mechanisms** to prevent misuse of our services.
- Cooperation with industry stakeholders to support efforts against illegal robocalling.

4. Call Volume & Risk Assessment

Our company generates **a very low volume of calls to the U.S. and Canada**, typically limited to **only a few calls per month**. This significantly reduces the risk of robocalling, spoofing, or other fraudulent activities.

5. Conclusion

Although we do not directly connect to the U.S. **PSTN**, we take our responsibility in the fight against illegal robocalls seriously. By implementing strict customer verification policies, actively monitoring traffic, and ensuring compliance with industry's best practices, we contribute to a secure and trustworthy telecommunications ecosystem.