

Robo Calling Mitigation Database (RMD) Mitigation Document

Wholesale Aggregator

1. Company Information

- **Company Name:** Assab Telecoms Limited
 - **Address:** 8, Ogunfayo Market Street, Eputu, Lagos, Lagos State, Nigeria
 - **FCC Registration Number (FRN):** 0035401173
 - **Point of Contact:** Ismail Adebayo, Director, ismail.adebayo@algenii.com, +2348168203370
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2. Description of Business

Assab Telecoms Limited, herein after referred to as **Assab Telecoms** is a wholesale telecommunications aggregator providing international voice termination services to carriers and service providers.

We aggregate and route calls through vetted downstream service providers globally. Our customers connect to our platform through the public internet. Our platform is also reachable worldwide.

3. Commitment Statement

Assab Telecoms commits to preventing illegal robocalls and maintaining compliance with the FCC's Robocall Mitigation Database (RMD) requirements. We actively implement effective robocall mitigation practices to detect, prevent, and mitigate illegal robocalls from traversing our network.

4. Robocall Mitigation Plan

A. Subscriber & Customer Vetting

- **Verification:** All wholesale customers undergo comprehensive identity verification, credit checks, and vetting before onboarding.
 - All customers at onboarding, will provide detailed contact information including: i) physical address with postcode ii) business name and registration details, iii) tax identification, iv) contact details – email and phone. v) contact

information for at least one responsible person and destination. The email address must be a domain dedicated to the business.

- **Contractual Requirements:** Customer agreements explicitly prohibit the origination and transmission of illegal robocalls.
 - Customer must also agree to comply with FCC regulations on robocalls and traffic to the USA.

B. Robocall Mitigation, Traffic Monitoring & Analysis

- **Separation of call types:** Part of our robocall mitigation include: i) Separation of convectional traffic and call centre (cc) traffic and ii) providing different trunks for each type of traffic.
- **Validation of caller-id:** We check all traffic with North America (NA) caller-id and confirm that they are valid NA phone numbers.
- **Call Rate Limits:** All callers are limited in the number of calls they can make in a period and to all destinations: We also use tools to limit:
 - calls per caller-id in a period of time depending on the call type (e.g 30 – 50 calls or call attempt in a period of 10 minutes for conversational trunk and 120 to 180 calls or call attempts in a period of 10 minutes for call centre calls).
 - Number of calls or call attempts to any destination in a period of time.
- **Real-time Monitoring:** In addition, we also employ advanced analytics tools to monitor call traffic patterns, detect unusual traffic volumes, short-duration calls, and spoofed caller IDs.
- **Regular Audits:** Regular audits of customer traffic patterns are conducted to proactively detect robocall trends.

C. Response & Mitigation Procedures

- **Immediate Action:** Upon detection of suspicious activity, offending traffic is promptly blocked or suspended.
- **Notification Protocol:** Customers originating suspicious traffic are notified immediately, required to investigate, and provide corrective action plans.

D. Traceback Cooperation

- Assab Telecoms cooperates fully with Industry Traceback Group (ITG) and relevant authorities, promptly responding to traceback requests and providing detailed information to assist in identifying sources of illegal robocalls.

5. STIR/SHAKEN Implementation Status

- Assab Telecoms does not originate calls directly. However, we require downstream providers who originate or terminate traffic to comply with STIR/SHAKEN mandates and attest to this compliance in contractual agreements.
- We verify STIR/SHAKEN certifications of downstream providers periodically.