



KOSMOS TIC S.A.S.
Soluciones Integrales de Telecomunicaciones VoIP

Robocall Mitigation Compliance with TRACED Act

Date: March 28, 2025

On behalf of: KOSMOSTIC SAS

Objective: Steps taken to comply with TRACED Act.

I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

KOSMOSTIC SAS is a voice over internet provider and we believe we are temporarily exempt from the requirements of §64.6301 as we participate with the industry to find an implementation solution before June 30, 2025.

KOSMOSTIC SAS is working with trusted interconnected carrier providers to adhere to STIR/SHAKEN.

www.kosmostic.com

 3336025041     @kosmosticsas

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II. General Prohibition Against Illegal Robocalling

KOSMOSTIC SAS end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its Terms of Service requirements.

Its Terms of Service prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the KOSMOSTIC SAS service to engage in or in connection with fraudulent activities

In addition, the company is updating its Terms of Service to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated Terms of Service.

KOSMOSTIC SAS end users are notified that KOSMOSTIC SAS may take action up to suspension or termination of service for violation of the Terms of Service.

III. Customer Identification

KOSMOSTIC SAS utilizes the “Know Your Customer” process to mitigate fraud and illegal use of KOSMOSTIC SAS services. KOSMOSTIC SAS maintains a close relationship with its subscribers. Our customer base has a particular traffic pattern that allows us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

KOSMOSTIC SAS has a screening procedure for new customers requesting service at or above large volume calling capability levels:

- KOSMOSTIC SAS will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Business requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- Customers addresses are verified to look for overlapping of multiple deployed voice path subscriptions.
- KOSMOSTIC SAS representatives may visit the customer physical location to verify the number of users at the location is appropriate for the volume of calling KOSMOSTIC SAS provides subscription-

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based services and we educate our subscribers or prospective subscribers regarding legal versus illegal robocalling activities to ensure they are compliant in their use of the product.

KOSMOSTIC SAS serves long-time business end users with large volume calling capability who are being directly contacted to review with them KOSMOSTIC SAS policies and efforts to prevent the KOSMOSTIC SAS network from being used for illegal robocalling.

IV. Network Traffic Monitoring

KOSMOSTIC SAS has deployed an in-house software traffic process that provides detailed analysis and reporting on outbound traffic to identify potential suspicious traffic volumes as well as illegal robocalling by detecting and flagging for review, suspicious calling patterns.

V. Traceback and Enforcement Cooperation

KOSMOSTIC SAS will actively cooperate with the traceback community including, providers, the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls.

KOSMOSTIC SAS have committed to dedicate sufficient resources to provide prompt and complete responses to traceback requests.

OSCAR GIRALDO

www.kosmostic.com

3336025041      @kosmosticsas

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