

Robocall Mitigation Plan

KOMPaaS.tech Ltd is a **foreign voice service provider** that originates a limited volume of calls toward the United States. All U.S.-bound traffic is handed off **exclusively to upstream carriers that have fully implemented STIR/SHAKEN and are listed in the FCC Robocall Mitigation Database**. The Provider does not control NANP numbering resources and therefore is currently ineligible to obtain an SPC token (see 47 CFR § 64.6304(b)).

Robocall Mitigation Practices

The Provider employs the following measures to prevent and remediate illegal robocalls:

1. **Customer Vetting (KYC)** – Every client passes pre-contract due diligence (corporate registry, sanctions lists, business purpose). High-volume autodialer use is prohibited.
2. **Terms of Service Enforcement** – Contracts expressly ban unlawful robocalls and caller-ID spoofing; violations enable immediate suspension.
3. **Caller-ID Control** – Outgoing CLI restricted to numbers assigned by our DID partners; alternative numbers require documented proof of control.
4. **Traffic Monitoring & Alerts** – Real-time analytics flag abnormal spikes, short-duration/high-CPS patterns and invalid ANIs; automated e-mail/SMS alerts are sent to the NOC.
5. **Reactive Suspension** – Traffic may be throttled or blocked pending investigation; service is restored only after written confirmation of legitimacy.
6. **Traceback Cooperation** – Detailed call records are retained for 24 months. The Provider commits to respond **within 24 hours** to all lawful traceback requests from the FCC, law-enforcement and the Industry Traceback Group.

Compliance Contact

Role	Name	E-mail	Phone
Compliance Officer	Alexander Melnikov	alex.melnikov@gmail.com	+36703651236

Certification

I, the undersigned officer of KOMPaaS.tech Ltd, certify under penalty of perjury that the foregoing mitigation practices are accurate and that the company will update this filing **within 30 days** of any material change.

Alexander Melnikov, Chief Compliance Officer 24 Apr 2025