

Robocall Mitigation Plan

1. Company Information

Legal Entity Name: 9311-8560 QUEBEC INC

Doing Business As (DBA): BISTELECOM

Business Number (NE): 831349592RC0001

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2. STIR/SHAKEN Implementation Status

BISTELECOM is a small Canadian VoIP provider that originates calls to the United States using upstream providers VoIP.ms and Telnyx, both of which support and apply STIR/SHAKEN on outbound calls where applicable. As a non-U.S. entity without IP interconnection capabilities, BISTELECOM does not implement STIR/SHAKEN directly.

3. Robocall Mitigation Practices

BISTELECOM has implemented a robust robocall mitigation program, including the following elements:

- Manual Know-Your-Customer (KYC) process before account activation, requiring:
 - Valid business identification (EIN, GST, or NE)
 - Proof of business address or website
 - Documentation of phone number ownership for port-in
- Real-time traffic analysis via FusionPBX CDR reports to detect call anomalies
- Fail2Ban integration for automatic IP blocking after failed authentication attempts
- Use of Telnyx's spam call alert API
- Immediate 24-hour suspension policy for any detected robocall or spoofing activity
- Reporting of offending numbers to FCC Consumer Complaints and upstream carriers

Client contracts include an Anti-Robocall clause. This contract is being progressively implemented with all existing clients and is mandatory for new clients prior to service activation.

BISTELECOM does not offer automatic account creation or self-service activation via its website. All accounts are manually approved and provisioned only after full KYC verification.

Furthermore, BISTELECOM exclusively uses VoIP.ms and Telnyx as upstream carriers for outbound call traffic to the United States. Both providers implement STIR/SHAKEN on eligible traffic and maintain FCC-compliant robocall mitigation practices. No other upstreams are used for U.S.-bound voice traffic.