

Yonder Media Mobile Inc. - ROBOCALL MITIGATION PLAN

Pursuant to 47 CFR § 64.6305, Yonder Media Mobile Inc. , hereafter “Company”, submits this report, as of May 12, 2025, on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls. Company reserves the right to modify, add, delete, or otherwise alter any of the policies and procedures described herein at any time as it deems appropriate to reflect its business, its capabilities, its needs, and Federal Communications Commission (“FCC”) obligations.

Company Background

Company is a prepaid mobile virtual network operator (“MVNO”) which relies on a major carrier’s network to offer service. Company therefore lacks ultimate control over the facilities/network infrastructure necessary to implement the STIR/SHAKEN framework.

Company has tailored its Robocall Mitigation Program considering the minimal risk of illegal robocalls being originated on its networks. The reasonable measures Company takes given the level of risk it faces are described in this plan.

STIR/SHAKEN Implementation

Company has not implemented the STIR/SHAKEN call authentication framework and is unable to do so. As noted above, Company is an MVNO, and it therefore lacks control over the facilities and network infrastructure necessary to implement STIR/SHAKEN. Since Company lacks this control, it relies on its underlying carrier partner, which owns and maintains the network infrastructure, to implement and utilize STIR/SHAKEN authentication. Based on the foregoing, Company’s role in the call chain is as a voice service provider which is compliant with their STIR/SHAKEN obligation because of their underlying carrier’s full STIR/SHAKEN compliance.

Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific measures that Company has implemented to detect and prevent illegal robocalls. MVNO offers service intended for single-line personal use. However, the measures described below explain how Company mitigates and addresses any risks it experiences. Company will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should it determine whether changes are appropriate, its practices may differ slightly from those described below.

Subscriber Due Diligence

- Company will suspend or terminate service to subscribers with a history of noncompliance with its obligations, including acceptable use of service.
- Specifically, Company policies prohibit unlawful use of services and provide for suspension and/or disconnection for such violations.
- Our terms and conditions, available on the web and in our application, clearly state that we

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have the right to terminate service if we see unfair usage (e.g., automatic calling).

Other Measures to Prevent or Avoid Exchanging Illegal Robocalls

- **Know-Your-Upstream Provider** – As an MVNO that originates end user calls, Company does not deal with upstream providers. All calls are routed through its underlying carrier's network upon origination.
- **Robocall Analytics and Blocking** – As an MVNO, Company mostly relies on its wholesale provider/underlying carrier partner to adopt analytics software for monitoring call traffic and to block relevant calls. Internal analytics, CDRs from AT&T (the MNO) are collected every five hours, MSISDNs with 300+ calls per day are identified, blocked, and then cancelled. AT&T also supplies a list of suspicious MSISDNs which are compared against our internal analytics using the same criteria for blocking and cancellations.

Responding to Traceback Requests

- Company adheres to the following best practices to facilitate its responses to traceback requests from the FCC, law enforcement, and the Industry Traceback Group ("ITG"), including:
 - **Call Logs** – These will be used to ascertain information regarding the inquiries from the above-mentioned authorities. To ensure our response is acceptable we have set up coverage that does not rely on one individual. Requests are sent to legal@yomobile.com to respond. The criteria to ascertain if Robocalling is present is the limit of MO calls per day. We have set a limit of 300 calls per day per MSIDN. The results are monitored and changes to the limit will occur, if warranted.
 - **Dedicated Point of Contact** – Company has designated an individual as a point of contact for addressing traceback requests.
 - **Justin Urena** - Senior Product Manager
 - legal@yomobile.com
 - 646-515-6789
 - **Ongoing Coordination** – Company will coordinate with the FCC, law enforcement, ITG, and other voice service providers in relation to instances of suspicious traffic, including exchanging information related to such traffic and ad hoc follow-up as appropriate.
 - **Prompt Investigation and Response** – Upon receiving a traceback request from the FCC, law enforcement, or the ITG, Company will fully respond to the traceback request within 24 hours of receipt of the request. In the event Company is unable to respond to a traceback request, it will provide sufficient information as to why it is unable to respond. Company will continue to cooperate with these

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entities in further investigating and stopping any illegal robocallers attempting to use its service to originate illegal calls.

- **Privacy of Traceback Investigations** – Company will not share information about traceback investigations, except with the ITG, with other providers involved in the traceback investigation, or when pursuant to a valid legal process.
- Company will periodically review records of traceback requests to identify subscribers that are the subject of repeated traceback inquiries. Company will determine an appropriate action to take on a case-specific basis, which may include working with the subscriber to mitigate illegal traffic, temporary suspension of the subscriber, and/or termination of the subscriber's service.
- Company maintains records of any traceback requests it receives, including the relevant parties involved in the requests.

Customer Vetting

- To the best of its ability, Company believes it follows best practices for vetting the caller identity and operational legitimacy for new and existing subscribers, consistent within practical limitations, as described by the NANC Call Authentication Trust Anchor Working Group. Company also collects the customer's name, email address, shipping address (if required), and billing address at the point of sale via the web and the application. At time of payment credit cards are checked for validity.

Know Your Customer

- Company requests information that is allowable by U.S. law, governing States, and in line with customer privacy rights. We collect data about their name, email address, shipping address (where applicable) and billing information. At time of activation, we provide the user with a unique PIN that is required to make any porting number request or access any information regarding the account providing a check that the end user indeed has ownership and right to that MSIDN.

Cooperation with Law Enforcement and State/Federal Regulators

- Company certifies that it has not been prohibited from filing in the Robocall Mitigation Database pursuant to a law enforcement action. Furthermore, Company is not currently subject to a formal Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing, nor has it been so in the past two years.
- Finally, Company commits to cooperating with state and federal regulators to help prevent all illegal robocalls. Specifically, Company will:
 - Respond to requests for information about illegal robocalls;

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- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement any new robocall mitigation procedures that are mandated, or to which Company has committed, to the fullest extent possible.