

ROBOCALL MITIGATION PROGRAM

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Date: 2025-05-23

ADWConnect Ltd is committed to complying with FCC regulations to prevent and mitigate the origination of illegal robocalls on the U.S. portion of our network. This document outlines the reasonable steps our company has implemented as required under 47 CFR § 64.6305.

1. STIR/SHAKEN Implementation

As an international VoIP provider, we currently do not operate IP-based voice services that originate within the United States. Therefore, we are not subject to mandatory STIR/SHAKEN deployment at this time. However, our upstream U.S.-based partners have implemented STIR/SHAKEN where applicable.

2. Know Your Customer (KYC)

We perform robust Know Your Customer (KYC) procedures before activating any new customer accounts:

- All new clients must complete a verification process that includes validating identity, business legitimacy, and intended use case.
- We assess customer profiles to ensure services are not misused for mass robocalling.
- Service terms prohibit the transmission of unlawful robocalls and make clear that violations will lead to immediate suspension or termination of service.

3. Call Analytics and Monitoring

We monitor network traffic through reports and tools provided by our upstream carriers. These providers apply real-time traffic analytics to detect:

- Unusual call patterns (e.g., high call volumes, short duration spikes)
- Invalid or spoofed caller ID usage
- Traffic associated with known robocalling behaviors

Suspicious activity is escalated internally for review, and we are able to block specific numbers, customers, or trunks where necessary. We rely on the advanced fraud and anomaly detection systems of our U.S.-based carriers, which are designed to align with industry-wide robocall mitigation standards.

4. Traceback Cooperation

We fully cooperate with the FCC, law enforcement, and the Industry Traceback Group (ITG). We respond to traceback requests within 24 hours and maintain a designated contact for such purposes:

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5. Right to Refuse Service

We reserve the right to refuse traffic or terminate service to any customer whose behavior suggests involvement in illegal robocalling. This includes traffic with invalid caller IDs, spoofed numbers, or flagged call behavior.

6. No Regulatory Actions

As of the date of this filing, we have not been subject to any FCC, ITG, or law enforcement actions related to robocalling.