

Alma Technologies LTD eSIMo Robocall Mitigation Plan

1. Overview

eSIMo provides app-based voice calling using prepaid credits. Calls are routed through a registered FCC FRN provider, who handles all gateway functions and implements STIR/SHAKEN on our behalf.

While we do not operate our own switching infrastructure, we take active steps to prevent the use of our platform for illegal robocalls.

2. STIR/SHAKEN Compliance

- eSIMo relies on a registered FCC FRN provider to handle call authentication via STIR/SHAKEN.
- All outbound calls are passed through a registered FCC FRN provider, which signs the calls per FCC requirements.
- We maintain an agreement confirming the registered FCC FRN provider responsibility for STIR/SHAKEN compliance.

3. Robocall Mitigation Measures

a. User Verification

- New users must provide valid email and billing information.
- We are using Stripe to verify credit card details and check for consistency between user data and payment info.

b. Traffic Monitoring

- We monitor CDRs and usage behavior to identify:
 - Unusual calling patterns (e.g., high volume, short-duration calls)

- Spikes in credit usage or calls to flagged destinations

- Accounts showing suspicious activity may be paused and reviewed manually.

c. Blocking & Alerts

- Offending users are blocked from placing calls.

- Known abusive numbers and destinations are blacklisted.

- We work with a registered FCC FRN provider to coordinate blocking if needed.

4. Traceback and Enforcement

- eSIMo responds to traceback requests and coordinates with a registered FCC FRN provider to provide call history if required.

- Our Terms of Service prohibit automated and fraudulent calling; violations result in account suspension and service denial.

5. Contact for Mitigation

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