

Wecom LLC d/b/a Wecom Fiber

Robocall Mitigation Plan

Reader Information

Title:	Wecom Fiber (“Wecom Fiber”) Robocall Mitigation Plan (the “Plan”)
Purpose:	Effective February 26, 2024, all providers (voice service providers including resellers of voice service, intermediate providers, gateway providers, and non-gateway providers) are required by the Federal Communications Commission (“FCC”) to file robocall mitigation plans and certifications in the Robocall Mitigation Database, as well as provide identifying information and certain additional information. In the Robocall Mitigation Database, providers certify whether, and to what extent, they have implemented the STIR/SHAKEN caller ID authentication framework.
Publication date:	2/27/2026
Review Date:	Ongoing

1.0 Purpose

On January 25, 2024, the Federal Communications Commission (“FCC”) announced Robocall Mitigation Database Filing Deadlines and Instructions and Additional Compliance Dates through bulletin DA 24-73, pursuant to the provisions of 47 C.F.R. § 64.6305, adopted by the FCC which require all “voice service providers” to establish a “Robocall Mitigation Plan”.

Voice service providers, regardless of whether they are required to implement STIR/SHAKEN—including all intermediate providers and providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN—are required to file certifications and Robocall Mitigation Plans to the Robocall Mitigation Database.

This document sets forth Wecom Fiber’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. Wecom Fiber views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to following these steps Wecom Fiber commits to responding fully and within 24 hours to all traceback requests from the Industry Traceback Group (“ITG”), law enforcement, and government agencies, and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

The FCC requires the following to be included in Robocall Mitigation Plans:

- (1) voice service providers must describe how they are meeting their existing obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls;
- (2) non-gateway intermediate providers and voice service providers must, like gateway providers, describe any “know-your upstream provider” procedures in place designed to mitigate illegal robocalls; and
- (3) all providers must describe any call analytics systems they use to identify and block illegal traffic and detail whether they use a third-party vendor or vendors and the name of the vendor(s).

Wecom Fiber’s Robocall Mitigation Plan is being filed in accordance with the above-referenced requirements.

2.0 Scope and Compliance

Wecom Fiber offers interconnected VoIP services to its customers on a resold basis. Wecom Fiber’s telecommunication carrier responsible for PSTN-related functions, Alianza, Inc. (“Alianza”), has implemented STIR/SHAKEN.

While Wecom Fiber necessarily relies on the robocall mitigation policies, procedures, and safeguards instituted by its wholesale provider, Alianza, Wecom Fiber has also adopted this Robocall Mitigation Plan to take its own measures to limit the potential for the origination of unlawful robocalls by its customers.

Principals, Affiliates, Subsidiaries, and Parent Companies:

Wecom LLC d/b/a Wecom Fiber is a private Delaware limited liability company.

No other business names are used by Wecom Fiber other than “Wecom LLC” and “Wecom Fiber”.

Previous business names and subsidiaries of Wecom Fiber include Wecom, Wecom, Inc., Wecom Services LLC, and Data-Max Wireless.

Wecom Fiber is not subject to an FCC, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

3.0 Exemption under FCC Rule 64.6305(d)(2)(i)

Wecom Fiber relies on a third-party telecommunications carrier for services and functions related to origination, termination, access to 911/E911, obtaining telephone numbers for use by Wecom Fiber’s customers, converting interconnected VoIP calls to the appropriate format for PSTN transmission, establishing relationships with other telecommunications companies, maintaining transmission facilities, and transmitting interconnected VoIP calls to and from the PSTN as needed.

Wecom Fiber offers interconnected VoIP services to its customers on a resold basis, and therefore lacks control over the network infrastructure necessary to implement STIR/SHAKEN.

4.0 Robocall Mitigation Plan

Wecom LLC d/b/a Wecom Fiber (FRN 0033704248) is an Internet Service Provider (ISP) that provides high-speed fiber-optic broadband and voice services, on a resold basis, to residential and business customers across Arizona. Its customers do not generally originate high volume calls. Wecom Fiber does not consider its customers or network a high risk for originating illegal robocalls. Wecom Fiber is not a foreign voice service provider.

Know Your Customer: Wecom Fiber has customer verification procedures in place to prevent new and renewing customers from using the Wecom Fiber network to originate robocalls. Wecom Fiber takes affirmative, effective measures to know its customers, such as obtaining the customer’s legal name and address, physical location, and contact information for each new account before activating service or making changes to existing services. Wecom Fiber will not provide services if a new customer’s identification cannot be verified.

Know Your Upstream: Wecom Fiber only receives traffic from its telecommunications carrier. Wecom Fiber has confirmed that its telecommunications carrier is registered in the FCC’s Robocall Mitigation Database.

Measures to Prevent or Avoid the Origination of Illegal Robocalls: Wecom Fiber customers are subject to enforceable Terms and Conditions and Acceptable Use Policy for all Wecom

Fiber services. These policies prohibit the use of Wecom Fiber services for any purpose other than the intended purpose, including use of the services for criminal activity or in a manner inconsistent with applicable laws, rules, and regulations.

Wecom Fiber and its telecommunications carrier, Alianza, have implemented monitoring and reporting procedures designed to detect and prevent fraudulent traffic on its network. Wecom Fiber is notified of any suspected fraudulent activity by a Wecom Fiber customer on the telecommunication carrier partner's network. Alianza reports in its Robocall Mitigation Database plan that it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud prevention best practices.

Mitigation: If Wecom Fiber has a reasonable basis to believe that a customer is originating suspected illegal robocalls, or receives notification from its telecommunications carrier of suspected unlawful robocall traffic, it will take action commensurate with the severity of the customer's offense, including, but not limited to, requiring the customer to remedy the problem, or suspending or terminating the customer's service.

4.1 Cooperation

Wecom Fiber is also committed to working with Alianza on traceback requests and complying with the Commission's robocall blocking requirements. Wecom Fiber understands that Alianza will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID or number that is on a DNO listed issued by ITG. Wecom Fiber has implemented mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.