

## **IP Telecom ( Internet Protocol Telecom Limited )**

### **Robocall Mitigation Plan**

**Updated – 22<sup>nd</sup> July 2025**

The following is IP Telecom submission to the Robocall Mitigation Database, pursuant to the FCC's directives outlined in the Report and Order(s) DA 24-73 (<https://docs.fcc.gov/public/attachments/DA-24-73A1.pdf>) (RMD Public Notice)

Indicated below are the robocall mitigation measures employed by IP TELECOM switching platform. IP TELECOM implements the features on their network and traffic. IP TELECOM certifies that its switching platform follows required traceback standards. IP TELECOM will continue to implement new robocall mitigation measures as they become available.

#### **24 Hour Response**

IP TELECOM certifies that it will respond to all Traceback Requests from the Industry Traceback group (ITG) within 24 hours and civil and criminal law enforcement agencies, cooperating fully in efforts to investigate and eliminate illegal robocalls, while following CPNI requirements.

#### **Partial STIR/SHAKEN implementation**

IP TELECOM has Partially implemented STIR/SHAKEN attestation. IP TELECOM has an address of Unit 1k, Block 71c, The Plaza, Parkwest, Dublin 12, Ireland All compliance or questions with the RMD and/or STIR/SHAKEN should be reported to [compliance@iptelecom.ie](mailto:compliance@iptelecom.ie)

#### **IP TELECOM RMD Verification**

IP TELECOM policies require refusing traffic from any provider not registered in the Robocall Mitigation Database (RMD).

#### **IP TELECOM KYC Verification**

IP TELECOM performs Customer Due Diligence and KYC, mandating that all potential customers complete a Know Your Customer (KYC) form and undergo a due diligence process.

#### **IP TELECOM DNO Compliance**

IP TELECOM is utilizing 3<sup>rd</sup> Party Do Not Originate ("DNO") lists, as well as adding additional numbers reported outside the list manually.

**IP TELECOM Mitigation Certification**

IP TELECOM certifies that all calls originating on our network are subjected to a robocall mitigation program that meets the specified requirements. We affirm that we are not barred from participation in the Robocall Mitigation Database, nor has IP TELECOM been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description. IP TELECOM has Partially implemented STIR/SHAKEN across our network, and is in process of completing Stir/Shaken certification for full compliance.

**Analytics**

IP TELECOM relies in part on third-party analytics. IP TELECOM relies upon ITG for Do Not Originate lists, and IP TELECOM relies upon Hadlo Technologies, LLC for additional spam filter services to block SPAM.

The following plan shall outline specific “commercially reasonable efforts/steps” IP TELECOM has undertaken to prevent origination and transmission illegal robocall traffic.

**Regulatory Compliance**

IP TELECOM is not currently, nor has it ever been, subject to any Commission, law enforcement, or regulatory agency action or investigation related to suspected unlawful robocalling or spoofing activities.

**Traceback CPNI**

For handling sensitive customer information (CPNI), IP TELECOM adheres to strict protocols, ensuring that such information is exclusively shared through the official ITG portal. It is important to note that CPNI is only disclosed within secure transmission.

To facilitate the traceback process, the official channels through which Traceback Requests can be initiated:

**Email:** Requests can be directed to [compliance@iptelecom.ie](mailto:compliance@iptelecom.ie) Upon receipt, IP TELECOM personnel will verify the request before proceeding.

**Direct Contact:** Brian Chamberlain (CTO), is the designated contact in the Robocall Mitigation Database, reachable at +35316877777 or via email at [compliance@iptelecom.ie](mailto:compliance@iptelecom.ie)

**NOC:** Available around the clock, our support center can be reached at [support@iptelecom.ie](mailto:support@iptelecom.ie) . Upon receipt a ticket is assigned, and tracked to completion.

**Methods and Efforts Employed to Avoid Carrying or Processing Illegal Robocalls**

- Do Not Originate “DNO” queries are utilized to confirm compliance with proper DNO requirements.
- Know Your Customer “KYC” measures have been implemented, and are reviewed yearly for customers, to ensure compliance.
- IP TELECOM commits to respond within the 24 hour requirement to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with

such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

- IP TELECOM shall take action when notified by the FCC of potentially illegal calls utilizing its network and will promptly inform the Commission that it is not the originating or gateway provider for the identified traffic, specify which upstream VSP with direct access to the U.S. public switched telephone network it received the traffic from, and, if possible, take lawful steps to mitigate this traffic.
- We conduct a review of our measures in an effort to combat new techniques that scammers use to compromise the PSTN in the US.
- IP TELECOM maintains an Acceptable Use Policy (AUP) that subscribers may sign before being permitted to use IP TELECOM's network. IP TELECOM's contractual terms with subscribers specify that IP TELECOM may take action up to suspension or termination of service for violation of the AUP.
- IP TELECOM works with its upstream carriers to detect a calling pattern consistent with illegal robocalls. If such a call is detected, IP TELECOM will identify the party that is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

#### **Traceback Requests.**

IP TELECOM certifies that its software follows required traceback standards. IP TELECOM commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, regulators, and the industry traceback consortium.

Brian Chamberlain

CTO



Updated 7/22/2025