

Robocall Mitigation Program – Masip Telecomunicaciones

1. Scope and Network Structure

Masip Telecomunicaciones is a foreign voice service provider based in Spain. We do not own or operate switching or transmission facilities in the United States. All outbound calls to U.S. numbers are originated by our customers, processed by our platform, and delivered to the United States exclusively through an upstream interconnection partner located in the U.S. This partner has fully implemented the STIR/SHAKEN authentication framework with full attestation, ensuring compliance with 47 CFR §64.6301(a)(1)-(2) for all calls we deliver.

2. Exemption Justification

Under 47 CFR §64.6301, foreign voice service providers without facilities in the U.S. are not directly subject to the STIR/SHAKEN implementation requirement, provided that their calls are handed off to a downstream carrier that has implemented STIR/SHAKEN. Our interconnection arrangement fully meets this condition.

3. Robocall Mitigation Measures

Even without a direct STIR/SHAKEN obligation, Masip Telecomunicaciones maintains a robocall mitigation program in line with 47 CFR §64.6305(a), including:

- **Know Your Customer (KYC):** We verify the identity, corporate details, and service usage of all customers prior to activation.
- **Traffic Monitoring:** We continuously monitor call patterns for anomalies that may indicate illegal robocall activity.
- **Blocking of Suspicious Calls:** We block traffic identified as originating from unverified or high-risk sources.
- **Traceback Cooperation:** We commit to responding fully to traceback requests from the FCC, law enforcement, or the industry traceback consortium within 24 hours.
- **Customer Enforcement Actions:** Immediate suspension or termination of service in case of verified illegal robocall activity.

4. Contact Information for Traceback Requests

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