



Barritel Limited

Robocall Mitigation Plan

Updated – 29 July 2025

The following is Barritel Limited ("Barritel") 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 Barritel switching platform. Barritel implements the features on their network and traffic. Barritel certifies that its switching platform follows required traceback standards. Barritel will continue to implement new robocall mitigation measures as they become available.

24 Hour Response

Barritel 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

Barritel has Partially implemented STIR/SHAKEN attestation. Barritel has an address of Barritel Limited, 147a High Street, Waltham Cross, Hertfordshire, EN8 7AP, UK. All compliance or questions with the RMD and/or STIR/SHAKEN should be reported to telco-compliance@barritel.com.

Barritel RMD Verification

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

Barritel KYC Verification

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

Barritel DNO Compliance

Barritel is utilizing 3rd Party Do Not Originate ("DNO") lists, as well as adding additional numbers reported outside the list manually.



Barritel Mitigation Certification

Barritel 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 Barritel 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. Barritel has Partially implemented STIR/SHAKEN across our network, and is in process of completing Stir/Shaken certification for full compliance.

Analytics

Barritel relies in part on third-party analytics. Barritel relies upon Hadlo Technologies LLC for their use of SOMOS, ITG and Do Not Originate lists, and Barritel also relies upon Hadlo for additional spam filter services to block SPAM.

The following plan shall outline specific "commercially reasonable efforts/steps" Barritel has undertaken to prevent origination and transmission illegal robocall traffic.

Regulatory Compliance

Barritel 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), Barritel 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 the secure transmission such as ITG portal.

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

Email: Requests can be directed to telco-compliance@barritel.com. Upon receipt, Barritel personnel will verify the request before proceeding.

Direct Contact: Kingsley Tart (Head of Infrastructure), is the designated contact in the Robocall Mitigation Database, reachable at +44 345 475 8800 or via email at kingsley.tart@barritel.com.

NOC: Available around the clock, our support center can be reached at customerservices@barritel.com. 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.

- Barritel 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.
- Barritel 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.
- Barritel maintains an Acceptable Use Policy (AUP) that subscribers may sign before being permitted to use Barritel's network. Barritel's contractual terms with subscribers specify that Barritel may take action up to suspension or termination of service for violation of the AUP.
- Barritel works with its upstream carriers to detect a calling pattern consistent with illegal robocalls. If such a call is detected, Barritel 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.

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

KD Tart

Head of Infrastructure

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