



Robocall Mitigation Program Description

1. Company Identification

- **Legal Name:** NovoTel Limited
- **Type of Provider:** International Gateway (IGW) operator licensed by Bangladesh Telecommunication Regulatory Commission (BTRC)
- **FCC Registration Number (FRN):** 0037453321
- **Corporate Address:** 30/G Pragati Sarani Gulshan-2 Dhaka-1212
- **Point of Contact:**
 - Name: Kazi Anowarul Rafique
 - Title: Head of Regulatory & Corporate Affairs
 - Email: kazi.rafiq@novotel-bd.com
 - Phone: +8801974444658

2. STIR/SHAKEN Implementation Status

NovoTel Limited has **not implemented STIR/SHAKEN** at this time. Our IGW operates in a hybrid environment where traffic enters from both VoIP and legacy TDM interconnections. Because STIR/SHAKEN standards have not yet been mandated or adopted in Bangladesh, we cannot apply attestation at the origination level.

However, NovoTel has adopted a **robust mitigation framework** (outlined below) to ensure that illegal robocall traffic is not routed into the U.S.

3. Robocall Mitigation Program

NovoTel Limited certifies that it has implemented the following **multi-layer robocall mitigation measures**:

a) Customer Vetting & Know-Your-Customer (KYC)

- All upstream carriers, Mobile Operators, and enterprise customers must be **licensed and registered entities**.
- Full KYC verification includes business registration, regulatory license validation (BTRC-issued), and traffic-use case justification.
- High-risk or unverifiable customers are **denied interconnection**.

b) Traffic Monitoring & Analytics

- Continuous analysis of call signaling and usage patterns to detect abnormal behaviors, such as:
 - High-volume short-duration calls





- Invalid CLI (Calling Line Identity) usage
- Sequential dialing patterns
- Suspicious traffic is flagged for **real-time intervention and blocking**.

c) Call Blocking & Enforcement

- Automatic suspension of routes or customers exhibiting illegal robocall patterns.
- Blacklist and whitelist management integrated into IGW switch and monitoring platforms.
- Escalation procedures for repeated violations, with permanent disconnection if necessary.

d) Cooperation with U.S. Authorities & Traceback Consortium

- NovoTel actively cooperates with the **U.S. Industry Traceback Group (ITG)** and responds to traceback requests within **72 hours**.
- All relevant CDRs and logs are maintained for at least **6 months** for compliance and audit support.

4. Compliance Commitment

NovoTel Limited commits to:

- Preventing the origination and termination of known or suspected illegal robocalls into the United States.
- Responding promptly to all traceback, FCC, and law enforcement requests.
- Updating this filing should our robocall mitigation practices change materially.

5. Certification

“I certify under penalty of perjury that NovoTel Limited has implemented the above-described robocall mitigation program as an international gateway provider, and that we will update this filing if our program changes in any material way.”

Signed: 
Kazi Anowarul Rafique
Head of Regulatory & Corporate Affairs, NovoTel Limited
Date: 1st September 2025



NovoTel Limited