

****I. Introduction and Commitment****

ATM Mobilis (FRN: 0037456365) is a Voice Service Provider AND Mobile Operator in Algeria committed to preventing illegal robocall traffic from originating on or traversing our network. This Robocall Mitigation Program (RMP) outlines the reasonable and effective steps we have implemented to combat this issue, in full compliance with the TRACED Act and all relevant FCC rules and orders.

****II. Customer Vetting and Onboarding (Know Your Customer - KYC)****

Our KYC process is a critical first line of defense. We have established strict procedures for vetting all new customers to ensure their legitimacy.

We require all new business customers to provide a physical business address, business registration details, and a primary contact person.

ATM Mobilis verifies this information through [e.g., publicly available business registries, third-party data providers, etc.].

New business customers must provide a detailed description of their intended use of our voice services, including the nature of their business and the type of calling traffic they expect to generate. All customer contracts include an Acceptable Use Policy that expressly prohibits illegal robocalling and grants us the authority to suspend or terminate service for non-compliance.

****III. Network Monitoring and Traffic Analysis****

We proactively monitor all originating traffic on our network for patterns indicative of illegal robocalling.

ATM Mobilis uses a proprietary system, to analyze call traffic in real-time and on a recurring basis.

Our systems are configured to detect and flag suspicious traffic based on metrics such as:

- * High call attempts per second (CPS) and high call volume
- * Unusually short average call duration and a low Answer-Seizure Ratio (ASR)
- * Spikes in traffic from a new or previously low-volume customer
- * The use of invalid or unassigned telephone numbers
- * When our systems identify suspicious activity, an alert is immediately sent to our dedicated Robocall Mitigation Team for investigation.

****IV. Enforcement and Response to Identified Violations****

Upon detection of suspicious or illegal activity, our team follows a strict protocol to mitigate the threat.

****Investigation:****

The team will immediately conduct a detailed investigation, which includes contacting the customer for an explanation of the traffic.

****Action:****

If the traffic is determined to be illegal, ATM Mobilis will take immediate action, which may include:

- * Issuing a formal warning and requiring immediate corrective action.
- * Blocking specific telephone numbers or traffic streams.
- * Suspension or termination of the customer's service, with no prior notice in cases of severe violation.

****V. Traceback and Cooperation with Authorities**** ATM Mobilis is fully committed to assisting in the investigation and prosecution of illegal robocallers.

- * We commit to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG).
- * We have a designated point of contact and an established internal process to ensure these requests are handled with the highest priority and efficiency.

****VI. STIR/SHAKEN Implementation and Number Validation****

- * STIR/SHAKEN status: Partially implemented with a plan to complete rollout.
- * We ensure that our customers are authorized to use the telephone numbers they present as caller ID.
- * We use [e.g., internal records, LRN lookups, etc.] to validate number ownership.

****VII. Conclusion****

This program represents our unwavering commitment to protecting our customers and the public from illegal robocalls. We will continue to evaluate and evolve our mitigation practices to ensure they remain effective against emerging threats.

Signed: Mr. Hamid Kherfi

Team Leader – Roaming

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01/09/2025