

STIR/SHAKEN Implementation and Robocall Mitigation Plan of New Mexico Telecom, LLC

1. Company Status and Service Model

New Mexico Telecom, LLC is a reseller of wholesale voice services provided by SkySwitch, a BCM One Company. All technical aspects of the service, including network management, call routing, and STIR/SHAKEN implementation, are handled by our upstream provider, SkySwitch. As a reseller, New Mexico Telecom, LLC does not own or operate the underlying network infrastructure.

2. STIR/SHAKEN Implementation Status

New Mexico Telecom, LLC meets its STIR/SHAKEN obligations through the complete technical implementation managed by our network partner, SkySwitch. SkySwitch is responsible for the creation and validation of call authentication signatures for all applicable traffic traversing its network.

3. Robocall Mitigation Program

New Mexico Telecom, LLC takes reasonable steps to avoid originating illegal robocall traffic. Our mitigation program is based on the following components:

- **Reliance on Upstream Provider:** We leverage the comprehensive robocall mitigation tools, technology, and network monitoring implemented by SkySwitch.
- **Prohibited Use Policy:** Our terms of service explicitly state that the use of our services for illegal robocalls or any type of cold marketing is not permitted.
- **Enforcement and Termination:** We are committed to investigating any reports of misuse. Any client found to be violating our policy against illegal robocalls will have their service immediately terminated.
- **Upstream Partner Requirements:** New Mexico Telecom, LLC will only accept calls directly from a domestic voice service provider if that provider's filing appears in the Robocall Mitigation Database and has not been de-listed.

4. Commitment to Traceback and Cooperation

- New Mexico Telecom, LLC commits to responding fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.

- New Mexico Telecom, LLC commits to cooperating fully with such entities in investigating and stopping any illegal robocallers that use its service.

5. Provider Role Clarification

For the purposes of FCC regulations under 47 CFR, New Mexico Telecom, LLC is **not** a gateway provider and is not subject to the specific obligations applicable to gateway or intermediate providers regarding Caller ID authentication.