

Robocall Mitigation Program Description for Ingetel Advanced Connections LLC

Company Name: Ingetel Advanced Connections LLC

FRN: 0032359382

Filing Date: September 18, 2025

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Role in the Call Chain

Ingetel Advanced Connections LLC is a voice service provider serving end-users in the United States. We originate calls to end-user customers and utilize Viirtue, Inc. as our upstream carrier and technology partner.

STIR/SHAKEN Implementation Status

Ingetel Advanced Connections LLC has fully implemented the STIR/SHAKEN authentication framework across its entire network. Although we do not perform the authentication directly, all calls we originate are authenticated by Viirtue, Inc., a certified third-party provider, in full compliance with FCC regulations. Therefore, our network is 100% covered by STIR/SHAKEN.

Robocall Mitigation Practices

In addition to STIR/SHAKEN, we maintain a robust robocall mitigation program that includes:

1. Know Your Customer (KYC): We verify the identity and legitimacy of all clients before activating services. This includes collecting business documentation, verifying contact information, and conducting background checks when necessary.
2. Traffic Monitoring: We monitor call traffic patterns for anomalies that may indicate illegal robocall activity. Suspicious activity is flagged and investigated immediately.
3. Upstream Provider Verification: We only work with upstream carriers (Viirtue) that are compliant with FCC regulations and STIR/SHAKEN standards.
4. Traceback Cooperation: We commit to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG).
5. Terms and Conditions Enforcement: Ingetel Advanced Connections LLC enforces its Terms and Conditions as part of its robocall mitigation strategy. These terms are

provided to all clients prior to service activation and include the following key provisions:

- a. Customer Responsibility: Clients agree to use our services solely for lawful purposes and in accordance with all applicable local, state, and federal regulations. Ingetel Advanced Connections LLC is not responsible for misuse by third parties, and clients remain liable for all activity conducted through their accounts, including unauthorized use.
- b. SMS/MMS Compliance: In compliance with federal regulations, all clients wishing to use SMS/MMS services through VoIP must register with The Campaign Registry for 10DLC validation. Ingetel provides guidance during the onboarding process to ensure proper registration and compliance with messaging standards.
- c. Usage Monitoring: Our service plans include defined usage limits for outbound calls, SMS, and MMS. We monitor account activity to detect abnormal patterns that may indicate illegal robocall behavior. Any usage exceeding normal thresholds is subject to review and may result in additional charges or service suspension.
- d. KYC Enforcement: All users are unique and non-transferable. Services are only activated after verifying the identity and legitimacy of each client, ensuring that the service is not shared among multiple individuals.

Compliance Statement

Ingetel Advanced Connections LLC certifies that it has not been subject to any enforcement action or investigation related to illegal robocalls or spoofing in its record.

Declaration

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signed:

Armando Javier Cordero

Owner, Ingetel Advanced Connections LLC

Date: September 18, 2025