

Codecom LLC d/b/a Optivon Robocall Mitigation Plan

This robocall mitigation plan is for Codecom LLC d/b/a Optivon (“Optivon”) with headquarters at 27 Calle Gonzalez Giusti Suite 100, Edificio Tres Rios Guaynabo PR 00968.¹ Unless otherwise stated, this mitigation plan applies to Optivon in each of its potential provider roles in the call chain: Voice Service Provider, Gateway Provider and Non-Gateway Intermediate Provider.

Optivon has not been prohibited from filing a certification in the Robocall Mitigation Database.

Optivon does not have a history of enforcement actions for illegal robocalls, or related state law violations.

Optivon uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group. This process includes the collection and review of entity-identifying information. If we find that an Optivon customer is using our network to send suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service, pursuant to the End User License Agreement and Terms of Service, other terms and conditions available at <https://www.optivonpr.com/legal/>, and other terms and conditions that together constitute the customer agreement.

Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers.

We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider.

If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service, pursuant to the terms and conditions of Optivon’s contractual agreement with its upstream providers that include explicit prohibition of illegal robocalls, including requirement for the upstream provider to identify its role in the call path, STIR/SHAKEN compliance, requirement for a robocall mitigation and compliance plan, vetting of upstream providers and proof of RMD registration, and allows termination of service for suspicious robocall activity.

Traceback

Optivon is committed to responding fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. We cooperate fully with such

¹ Optivon LLC has merged with Codecom LLC, with Codecom, LLC being the surviving entity, but the company still does business under the name “Optivon.” To avoid any confusion, and out of an abundance of caution, the company has submitted two substantially similar submissions into the robocall mitigation database – one for each name.

entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Traffic Monitoring and Analytics; Mitigation

We use call analytics software from TransNexus to monitor voice traffic in real-time to prevent illegal robocalls. The software provides detailed reporting to identify suspected robocalls.

We investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn them to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

STIR/SHAKEN

We have registered with the STI-PA using OCN 087D.² We have our own STIR/SHAKEN certificates issued by TNS Certification Authority (STI-CA) and TransNexus (STI-CA). We have implemented STIR/SHAKEN solution supplied by TNS when authenticating calls originated from our Class V switch. We have implemented TransNexus Stir/Shaken solution when authenticating calls originated or traversing our Class IV switch as required.

As a Voice Service Provider, Non-Gateway Intermediate and Gateway Provider, we have implemented and are fully STIR/SHAKEN compliant.

Do-Not-Originate (DNO) Implementation

Optivon has implemented Do-Not-Originate (DNO) blocking in compliance with 47 C.F.R. § 64.1200(o). We maintain and regularly update a DNO list consisting of numbers that should never originate calls, including inbound-only government and enterprise numbers. We use TransNexus DNO solution based on the Traceback Group DNO database. All outbound traffic is screened against this list in real time, and calls matching DNO entries are automatically blocked from originating on our network.

This DNO blocking is part of our broader robocall mitigation program, which also includes full STIR/SHAKEN implementation on IP-based traffic and active participation in industry traceback efforts. We monitor effectiveness through call analytics and maintain documentation to demonstrate compliance upon FCC request.

Ownership Information

Optivon is under the ultimate ownership and control of Mr. Luis G. Romero through a Trust of which he is the sole grantor and trustee.

² This OCN used by the company is currently under the name Optivon due to its prior assignment.