

Robocall Mitigation Plan

BUSINESS INFORMATION

Telco Papa Ltd.
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CONTACT INFORMATION

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OVERVIEW

In the Federal Communications Commission’s recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (2023) (“R&O”), it is stated that all voice service providers (“VSPs”) must file robocall mitigation plans (“RMPs”) that, among other things, outline “reasonable steps” taken to avoid originating illegal robocalls.

In addition to the “reasonable steps,” the FCC requires that a RMP include:

- “know your customer” procedures;
- “know your upstream provider”;
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

PURPOSE

Telco Papa Ltd. (“Telco Papa,” the “Company”) is a small VSP and an MVNO dedicated to stopping illegal calls from traversing our network and monitoring the calls coming into our network. Telco Papa is a “pure reseller” that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, Telco Papa was previously exempt from the FCC’s STIR/SHAKEN rules. The R&O requires that pure resellers such as Telco Papa now file robocall mitigation plans (“RMPs”). This document delineates Telco Papa’s RMP. Because Telco Papa does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, Telco Papa works closely with its upstream provider to carry out the required mitigation functions.

KNOW YOUR CUSTOMER - SUBSCRIBER KYC&DUE DILIGENCE

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with Telco Papa in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Telco Papa's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- Contact person(s);
- Zip code;
- Email (Google Sign-in) / Apple ID (Apple ID);
- Subscriber location

The Company has only Post Paid and Prepaid plans. Due to the nature of the Company's business model and service plans, an individual subscriber enters into a contact term subscriber Agreement with the Company.

Upon establishing a relationship with the Company, the Subscriber is not only required to sign a Service Agreement with the Company for a designated length of time, the Subscriber must also agree to abide by all Terms and Conditions of Use, The Company Privacy Policy and also the Company Acceptable Use Policy ("AUP"). Among other things, the AUP prohibits:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law;
- violating applicable industry accepted guidelines; and
- using Telco Papa's service to engage in or in connection with fraudulent activities.

Under the terms of the agreement the Subscriber executes with the Company (for example, a Subscriber Agreement), the Company has the right to halt, suspend for an indefinite period of time, and/or terminate service to any subscriber who violates any applicable provisions.

Immediate suspension, or termination of a Subscriber by Company can be based on any violations of the Company AUP, among other things the unlawful use of Service by the Subscriber and/or any individual who may access or use a Subscriber's device (of which the Subscriber is responsible) or any other policy which is governed by the Company.

KNOW YOUR UPSTREAM PROVIDERS

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls, and Call Authentication Trust Anchor*, Seventh Report and Order in CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking in CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59, 38 FCC Rcd 5404 (2023), Telco Papa provides the following information concerning its upstream voice service carrier.

Telco Papa has one upstream provider from which it receives voice traffic:

AT&T & Affiliates
208 S. Akard St.,
Dallas, TX 75202

Telco Papa has a master service agreement with its upstream provider and has received assurances in writing from its officials that it has, and will continue to, sign calls transmitted to Telco Papa and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Telco Papa. Telco Papa and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

MITIGATION DURING SERVICE

Telco Papa works with its upstream provider mentioned above to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP-originated calls are signed with subscriber caller ID only after number validation; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

ANALYTICS FOR MONITORING TRAFFIC

Telco Papa works with its upstream provider to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

INVESTIGATE SUSPICIOUS ACTIVITY

When traffic analysis indicates the presence of likely illegal robocalling, Telco Papa works with its upstream provider to follow defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid;
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber; and
- temporarily suspending or permanently terminating the subscriber account.

Because Telco Papa does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in Telco Papa's analytics.

Telco Papa follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Telco Papa will devote sufficient resources to provide prompt and complete resources to traceback requests. The Company will also have a Dedicated Point of Contact to deal with all inquiries from any law enforcement agency or ITG to deal with traceback requests.

Telco Papa commits to responding to traceback requests fully within 24 hours.

Telco Papa works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to Telco Papa by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Telco Papa contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

For all new and renegotiated Telco Papa contracts governing the transport of voice calls, Telco Papa will endeavor to contractually require Telco Papa's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Upon notification by any Federal agency, any regulatory governing, the ITG, and/or any other like or similar agency or organization the Company will immediately contact its upstream provider and request to place a call block and also to report any identified possible or actual illegal traffic. The Company will then deal with both the agency making the request/inquiry and the upstream provider to investigate any suspicious activity on an ongoing basis.

CERTIFICATION OF ABHISHEK GUPTA

I, Abhishek Gupta, CEO of Telco Papa Ltd. (“Telco Papa”), do hereby certify, under penalty of perjury, the following:

(1) Telco Papa, by virtue of its status as a “pure reseller” does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.

(2) Telco Papa’s Business name and primary address are as follows:

Telco Papa Ltd.

254 Chapman Road, Suite 208 #23974,

Newark, DE19702

(3) Telco Papa has no other business names in use.

(4) Telco Papa has not previously used any other business name.

(5) The following persons/entities own more than 10% of Telco Papa each: Rockstar Automations, Ltd.

(6) The following persons exercise management and control over Telco Papa: Abhishek Gupta.

(7) Telco Papa has the following subsidiaries/affiliates: Rockstar Automations, Ltd.

(8) None of the persons/entities in items 5 – 7 above have had their licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.

(9) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.

(10) Telco Papa’s role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.

(11) Telco Papa has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

(12) Telco Papa is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

(13) Telco Papa is not required to have and does not have an operating company number.

/Abhishek Gupta/

Abhishek Gupta

October 2, 2025