



Robocall Mitigation Plan

QR Communications & Technologies SLR

October, 2025

1. Introduction

Pursuant to the FCC's Sixth Caller ID Authentication Report and Order and revisions to 47 C.F.R. §§ 64.6303–64.6305, all voice service providers, including foreign providers delivering traffic to the United States, must maintain a Robocall Mitigation Program (RMP) and certify their compliance in the Robocall Mitigation Database (RMD). Providers must also certify their STIR/SHAKEN implementation status and ensure that all calls they originate, carry, or process are subject to a robocall mitigation program consistent with the Commission's rules.

Under 47 C.F.R. § 64.6305(a)(2) (and the parallel requirements for gateway and non-gateway intermediate providers), a provider's mitigation plan must include reasonable steps to avoid originating, carrying, or processing illegal robocall traffic and a commitment to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium (ITG), and to cooperate in investigating and stopping illegal robocallers that use its services.

This plan describes the concrete controls QR Communications & Technologies SLR (QR COMM & TECH) uses to prevent illegal robocalls, our full cooperation with traceback and law enforcement requests, and our procedures for monitoring, remediation, and blocking when required. Because U.S. downstream carriers are prohibited from accepting traffic from providers that are not properly listed in the RMD (including foreign providers), maintaining an accurate, up-to-date RMD filing and executing the measures described herein is essential for QR COMM & TECH Technology U.S. operations.

As explained below, QR COMM & TECH T commits to: maintain and follow this Robocall Mitigation Program aligned with 47 C.F.R. § 64.6305; accept traffic only from upstream providers listed in the FCC's RMD, promptly investigate and block any traffic identified as illegal or suspicious upon notification from the FCC's Enforcement Bureau and respond within 24 hours to all traceback inquiries from the ITG.

QR COMM & TECH further affirms that no prior RMD certification has been removed by Commission action and that it has not been prohibited from filing in the RMD.

2. Company Summary

QR Communications & Technologies SRL is a Romania based telecom company focused on wholesale VoIP resale, working only with selected and screened carriers and aggregators.

Principals: Ermond Gussha – Director

3. STIR/SHAKEN Call Authentication

QR COMM & TECH as a foreign voice service provider (47 C.F.R. § 64.6300) it is not required to obtain an STI-PA SPC token or to sign calls directly under the U.S. STIR/SHAKEN framework. Nevertheless, QR COMM & TECH maintains an operational Robocall Mitigation Plan and an active RMD listing, and it applies rigorous KYC protocols, ongoing traffic analytics, and prompt remediation to all U.S. bound traffic.

4. Know your Customer Protocol and Customer Vetting Practices

As part of onboarding, QR COMM & TECH requires each prospective customer to complete a KYC questionnaire and to acknowledge that its use of QR COMM & TECH services is subject to a robust legal and regulatory regime governing outbound calling practices. The questionnaire collects core identity and business details, including legal name/DBAs, jurisdiction of incorporation and registration/license number, tax/VAT ID, physical business location, primary contacts (phone, headquarters address), FCC FRN and 499 Filer ID (if applicable).

Before activation, QR COMM & TECH validates the information and risk profile. This review includes checking the customer's website, online presence, and physical location; confirming corporate existence/status and ownership and reviewing the customer's RMD listing.

QR COMM & TECH retains all KYC records (completed forms and supporting documents).

As part of the onboarding process QR COMM & TECH also includes a Robocall Compliance Acknowledgment in its KYC form. Each customer must review and sign this acknowledgment before activation. By signing, the customer certifies compliance with all applicable U.S. laws and FCC rules regarding illegal robocalls, acknowledges the Industry Traceback Group (ITG) and its procedures, will respond promptly to traceback requests, and will take effective measures to identify and mitigate any suspected illegal or unlawful traffic on its network.

5. Accepting Traffic from Providers in the RMD

QR COMM & TECH will accept U.S.-bound traffic only from upstream providers that are actively listed in the FCC's RMD. Verification of an active RMD listing is a mandatory step in QR COMM & TECH's new customer's onboarding protocol.

6. Mandatory Blocking Following Commission Notification

QR COMM & TECH will promptly investigate and block illegal traffic upon receiving a notice from the FCC's Enforcement Bureau, in accordance with applicable FCC rules.

7. Proactive Network Monitoring, Call Filtering and Blocking

QR COMM & TECH monitors network usage and reviews call detail records (CDRs) to detect suspicious activity and calling patterns (e.g., short-duration, abnormal ASR/ACD/PDD). When illegal robocalling or spoofing is suspected or we are notified by the FCC or other partners, we immediately identify the responsible customer or upstream carrier and take appropriate action, which may include: blocking implicated numbers or trunks pending investigation, notifying the upstream provider, verifying traffic volumes, etc.

8. Traceback Requests Process

QR COMM & TECH designates a 24/7 Traceback Point of Contact and commits to respond within 24 hours to traceback requests from the FCC, law enforcement and the ITG. Upon receipt, we (i) acknowledge the request, (ii) preserve evidence (CDRs, SIP/identity headers, logs), (iii) identify the source customer/upstream and the relevant routes and (iv) will also open internal tickets with any customer/upstream carriers identified in the traceback.

Traceback Request Point of Contac:

Name:	Ermond Gusha
Title:	Director
Email:	compliance@qrtechsrl.com
Phone:	+40 726-543-602

9. RMD Registration and RMP updates

As required QR COMM & TECH will update its RMD filing within ten (10) business days of any change to covered information, including its Robocall Mitigation Plan.