

TheSwissXperts AG

Robocall Mitigation Plan

Pursuant to 47 C.F.R. § 64.6305, TheSwissXperts AG submits this report on its implementation of the STIR/SHAKEN call authentication framework and its plan to prevent and mitigate illegal robocalls.

This report describes the status of the practices and procedures, including details of the reasonable steps taken to avoid originating illegal robocalls and demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls. This program applies to all voice traffic originated, routed, or terminated via our network.

1. Traffic Monitoring and Analysis

- **Real-time Monitoring:** We utilize analytics tools to monitor voice traffic in real-time, searching for suspicious patterns typical of illegal robocalls (e.g., high volume of short-duration calls, high call failure rates, or the use of non-characteristic dialing sequences).
- **Identification of Abuse Sources:** We conduct regular retrospective analysis (daily/weekly) to identify customers or upstream providers who generate abnormally high volumes of unsolicited calls.

2. Filtering and Blocking Mechanisms

- **Reputation-Based Filtering:** We implement filters based on lists of numbers and routes known to be sources of fraud or illegal robocalls. These lists are updated regularly (daily).
- **Blocking of Illegal Numbers:** We immediately block all calls utilizing telephone numbers that are clearly illegal or impossible (e.g., invalid numbers or unassigned North American Numbering Plan numbers).
- **Caller ID (CLI) Control:** We verify Caller ID information to detect and block obvious cases of spoofing or identity usurpation.

3. Customer Due Diligence and Compliance

- **New Customer Vetting:** We conduct an in-depth due diligence (**vetting**) process before integrating any new customer or intermediate traffic routing partner.

- **Contractual Clauses:** All our contracts include strict clauses prohibiting the use of our service for sending illegal robocalls and fraudulent activities.
- **Acceptable Use Policy:** We enforce a zero-tolerance policy and immediately terminate service for customers or providers whose activity has been clearly identified as illegal.

4. Cooperation with Industry and Regulatory Bodies

- We fully cooperate with traceback requests from the FCC and the industry (via mechanisms such as the Robocall Traceback Consortium) to identify the source of illegal calls.
- We commit to complying with STIR/SHAKEN regulatory requirements as soon as the technology becomes technically feasible across our entire network.