

Robocall Mitigation Program – FCC Filing

Company Information

Company Name: Pioneer Global Services Ltd

Address: Havelock Hub, 14 Havelock Place, Harrow - HA1 1LJ, London, UK

Contact Person: Sanjay Rode

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Type of Provider: Voice Service Provider

Jurisdiction: United Kingdom

Exemption Justification

Pioneer Global Services Ltd is a UK-based voice service provider that does not have direct access to the U.S. numbering resources required for participation in the STIR/SHAKEN framework. Pursuant to 47 CFR § 64.6301(a), implementation of STIR/SHAKEN applies to IP-based voice services within the United States. As a non-U.S. operator, we are ineligible to obtain the STI-PA certificate required for STIR/SHAKEN call authentication and are therefore not required to implement STIR/SHAKEN. All calls originated on our network are instead subject to our robocall mitigation program as described below, consistent with 47 CFR § 64.6305(a).

Robocall Mitigation Program

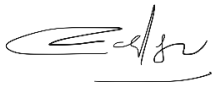
Our company implements the following measures to prevent the origination of illegal robocalls:

- **Customer Vetting:** We perform identity verification, contract reviews, and due diligence before enabling outbound calling for any customer.
- **Call Monitoring:** We actively monitor traffic patterns to detect unusual call volumes or high-risk destinations; anomalies are investigated promptly.
- **Record Keeping:** We retain full call detail records (CDRs) for a of 12 months to support traceback and enforcement investigations.
- **Traceback Cooperation:** We respond to traceback requests from the Commission, law enforcement, and the industry traceback consortium within 24 hours.
- **Blocking Procedures:** We have procedures to immediately suspend or block traffic from customers found to be originating unlawful calls, and to remediate before restoring service.
- **Auto Dial and Machine Dial:** We don't support auto dialing and Machine dialing.

These procedures are consistent with the requirements of 47 CFR § 64.6305(a).

Compliance Statement

Pioneer Global Services Ltd certifies that this program is in place and actively enforced. We are committed to cooperating fully with all traceback and enforcement requests and to taking prompt action against any illegal robocall activity detected on our network.



Sanjay Rode

Director

Pioneer Global Services Ltd