

Robocall Mitigation Plan

A. Provider Role Definition & Traffic Sources

RAF TELECOM LLC Role Summary

- Primary Role: Originating Voice Service Provider (VSP) — RAF provisions voice services directly to enterprise customers and small business end users and originates calls from those customers onto the public switched telephone network (PSTN).
- Secondary Role: Non-Gateway Intermediate / Domestic Wholesale Carrier — RAF provides domestic transit and limited termination services for a restricted set of vetted domestic wholesale partners (resellers, aggregators). In this role RAF carries traffic on behalf of partners but does not provide international gateway or international ingress.
- Current Operations: RAF does not operate as a Gateway Provider and does not accept or originate international ingress traffic. All traffic on RAF's network originates domestically or is domestically sourced via vetted wholesale partners.

Traffic Source Disclosure

- **Direct Retail Originations:** Calls that originate from RAF-managed customer accounts or customer premises equipment (CPE) where RAF controls the account credentials and provisioning.
- **Wholesale Transit/Third Party:** Calls received from domestic wholesale partners for transit/termination. Such traffic is subject to enhanced onboarding and technical controls, and RAF will not sign or route wholesale-originated traffic for PSTN egress unless attestation requirements are met.

B. Wholesale / Third-Party Traffic Controls

- Wholesale traffic is explicitly disclosed and subject to all onboarding, monitoring, and enforcement measures described in the RMP.
- Wholesale accounts are provisioned on segregated logical trunks with per-account limits (CPS/CC, daily caps) and must complete KYC and, where applicable, EDD before production routing.
- RAF will not sign traffic on behalf of downstream unknown third parties without evidence to meet Attestation A criteria; default for wholesale traffic is Attestation B when RAF has verified the upstream partner identity but not ANI ownership.

C. Attestation Governance & Assignment

Overview

-RAFuses Attestation A and Attestation B only. Attestation C is not used because RAF does not operate gateway/international ingress functions.

Attestation A (Full)

-Conditions for Attestation A:

1. RAF has verified the customer's legal identity (corporate documents, government ID for authorized signatory).

2. RAF has verified the customer's right to use the specific calling number (ANI) through one or more of the following:

- Letter of Authorization (LOA) from the number owner referencing the specific ANI(s), signed by an authorized representative; or

- Numbering assignment documents or records demonstrating ownership; or

- Direct provisioning records showing the ANI is allocated to the customer's account on RAF systems (i.e., RAF controls the number assignment).

3. Customer has an active, provisioned account in RAF's provisioning system with clear billing and support contacts.

- Verification Process:

- Collection of LOA/ownership documents during onboarding.

- Cross-checking with any available CNAM/numbering databases or billing records.

- Escalation to EDD for any anomalies or when the ANI history indicates prior problematic use.

- Use: Attestation A is applied only to traffic where RAF has completed the above checks and documented the evidence in the account record.

Attestation B (Partial)

-Conditions for Attestation B:

1. RAF has a verified business relationship with the customer or upstream partner (KYC completed).

2. RAF has not verified ANI ownership or cannot conclusively prove the customer's right to use the ANI(s) (**e.g., partner routes calls from their PBX with their own numbering resources**).

3. The customer or partner has agreed contractually to cooperate with traceback and provide downstream contact details and LOAs upon request.

- Use: Default for vetted wholesale partners and enterprise customers where RAF does not control the specific ANI. Before applying Attestation B, RAF performs risk checks (traffic profile, historical abuse, ACR/ASR baselines). Attestation B may be restricted by destination or rate limits.

Wholesale Traffic Attestation Policy

- Wholesale-originated traffic will not be signed as Attestation A unless RAF can verify ANI ownership per Attestation A criteria. - Wholesale traffic from partners who pass KYC but not ANI verification will be eligible for Attestation B subject to rate limits, monitoring, and additional safeguards (e.g., destination restrictions). - RAF will document the attestation decision and evidence in the customer account and retain records for 12 months.

D. Use of Attestation C

- **RAF TELECOM does not utilize Attestation C:** RAF does not provide international ingress/gateway services today and has no current operational plans to do so. All prior mentions of Attestation C have been removed or qualified as not applicable.

E. Treatment of Unsigned Traffic

Outbound PSTN Egress

- **Policy: Strict "No-Signature, No-Route"** for outbound PSTN egress. Any call presented for egress to the PSTN that does not carry a valid STI signature and meet RAF attestation rules will be blocked at the edge and not routed to PSTN carriers.

Inbound/Transit from Domestic Partners

- **Policy:** RAF may accept inbound/transit traffic from domestic partners into our network for purposes such as testing, controlled transit, or when acting as an intermediate carrier.

However:

- **RAF** will not sign such traffic for PSTN egress unless it meets **Attestation A or B criteria** as required.

- **Unsigned or unauthenticated inbound traffic** will be placed into a monitored zone and may be rate limited, routed to non-PSTN destinations (e.g., sinks/test routes), or blocked based on threat scoring.

- **Where acceptable risk controls and attestations are not present**, RAF will refuse **PSTN egress** for that traffic and may suspend or terminate the partner relationship.

F. Operational Enforcement & Monitoring

- Real-time analytics monitor per-account and per-trunk metrics (CPS/CC, ACR, ASR, short-call rates). - Automated mitigations (soft/hard throttles, suspension) are triggered based on threshold violations. - Traceback cooperation: RAF retains CDRs, SIP traces, and SBI for minimum 12 months and will respond to ITG and lawful requests within 24 hours.

G. Documentation & Recordkeeping

-**All attestation evidence** (LOAs, KYC records) and attestation decisions are logged in the customer record and retained per policy to enable audits and traceback.

H. Certification

Icertify that the information contained in this Robocall Mitigation Plan is true and accurate, and that RAF TELECOM LLC has implemented the controls described above.

Signed: Muhammad Ather Rehman

Title: CEO / RAF TELECOM LLC

Date of Issuance: March 25,2026,

FRN: 003 80 273 7 1