



Robocall Mitigation Plan

Company Name: WorldNet Communications Services Inc.

FRN: 0003733789

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Effective Date: Feb 20th 2026

Last Updated: Feb 20th 2026

1. Purpose

This Robocall Mitigation Plan documents the policies, procedures, and technical safeguards implemented by WorldNet Communications Services Inc. to prevent illegal robocalls and comply with all applicable FCC rules and voice service provider obligations. As a reseller of interconnected VoIP services, we rely on upstream providers that are fully STIR/SHAKEN compliant and we maintain additional safeguards to prevent misuse of our network.

2. Company Role Classification

WorldNet Communications Services Inc. operates as: CLEC, ITSP, VoIP Reseller

- ☒ Reseller of voice services
- ☐ Facilities-based provider
- ☐ Wholesale voice provider
- ☒ Retail voice provider serving end users

We do **not** originate calls directly from switching infrastructure. All calls originate via upstream carriers.

3. STIR/SHAKEN Implementation Status

Our upstream carrier(s) are fully STIR/SHAKEN compliant and sign outbound calls with full attestation when appropriate.

Because we do not control originating network elements, we do not perform direct STIR/SHAKEN authentication ourselves. However, we ensure compliance by:

- Contracting only with upstream providers that are certified STIR/SHAKEN compliant
 - Maintaining documentation verifying upstream attestation capability
 - Periodically reviewing provider compliance status
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4. Customer Vetting Procedures

To prevent illegal robocall traffic from entering the network, we perform reasonable due diligence before activating service for any customer capable of placing outbound calls.

Verification steps may include:

- Identity verification of customer or business entity
- Business registration validation
- Review of intended use case for voice services
- Review of website or online presence
- Screening against known robocaller complaint databases
- Verification of physical address and contact information

Accounts may be denied or delayed pending additional review.

5. Traffic Monitoring & Analytics

We monitor call activity for suspicious or unlawful patterns using automated and manual review methods.

Indicators monitored include:

- High call volume spikes
- Short duration call patterns
- High unanswered call ratios
- Sequential or auto-dialed number patterns
- Complaints from carriers, analytics providers, or consumers
- Traceback requests

When anomalies are detected, traffic may be immediately restricted or suspended.

6. Complaint Handling Procedures

We maintain a documented process for receiving and responding to robocall complaints.

Complaint intake channels:

- Email: Lauraa@worldnet1.net
- Phone: 805-585-6347

Response procedure:

1. Complaint logged and assigned case number
2. Traffic logs reviewed
3. Customer contacted for explanation
4. Temporary suspension if warranted
5. Investigation completed within reasonable timeframe
6. Records retained for compliance

7. Traceback Cooperation

We cooperate fully and promptly with traceback requests from:

- Industry traceback consortiums
- Law enforcement agencies
- Regulatory authorities

Upon receiving a traceback request, we:

- Identify the relevant customer account
 - Provide call detail records when legally permitted
 - Suspend or terminate offending accounts if illegal activity is confirmed
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8. Enforcement Actions

Accounts suspected of illegal robocalling may be subject to:

- Immediate call blocking
- Traffic throttling
- Temporary suspension
- Permanent termination
- Reporting to upstream providers or authorities

Our Acceptable Use Policy expressly prohibits:

- Unlawful robocalling
- Caller ID spoofing
- Fraudulent calling campaigns
- Traffic pumping schemes

Customers must agree to these terms before service activation.

9. Record Retention

We retain the following records for a reasonable period consistent with regulatory requirements:

- Customer identity documentation
 - Call detail records (CDRs)
 - Complaint records
 - Investigation notes
 - Enforcement actions taken
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10. Training & Internal Compliance

Relevant personnel receive training on:

- Illegal robocall indicators
- Compliance procedures
- Complaint handling
- Escalation protocols

Compliance procedures are reviewed periodically and updated as rules evolve.

11. Upstream Provider Compliance Assurance

We maintain written confirmation from our upstream carrier(s) stating:

- Full STIR/SHAKEN implementation
- Active participation in traceback efforts
- Compliance with FCC voice provider obligations

We reevaluate upstream providers periodically to ensure ongoing compliance.

12. Certification Statement

I certify that the information contained in this Robocall Mitigation Plan is true and accurate to the best of my knowledge and that **[Company Name]** maintains policies and procedures reasonably designed to prevent illegal robocall traffic from originating on or passing through our network.

Authorized Representative:

Name: James A Dainko

Title: President

Signature: _____

Date: 3-30-2026
