

ROBOCALL MITIGATION PLAN (RMP)

Prepared for the Federal Communications Commission (FCC) Robocall Mitigation Database

1. Company Information

Company Name: Coolwave Communications Limited

FCC Registration Number (FRN): 0037284916

Company Address: 6th Floor, 2 Grand Canal Square, Dublin 2, D02 A342, Ireland

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2. STIR/SHAKEN Implementation Status

Pursuant to 47 CFR § 64.6305, Coolwave Communications Limited certifies the following status:

- ☐ **Full Implementation:** STIR/SHAKEN is fully deployed on all IP portions of the network.
- ☒ **Partial Implementation:** STIR/SHAKEN is currently being deployed on the IP portions of the network.
- ☐ **Implementation Extension:** Operating under an active FCC extension but maintaining this RMP.

Coolwave Communications Limited has entered into a **Hosted Signing Agreement with NUSO** and is currently in the process of obtaining its **Service Provider Code (SPC) token through Iconectiv**. We are moving toward full cryptographic signing of all traffic. During this transitional phase, Coolwave Communications Limited enforces a strict Robocall Mitigation Plan for 100% of its traffic. Once the certificate is issued by an approved Certificate Authority, Coolwave Communications Limited will update its status in the Robocall Mitigation Database and utilize NUSO's infrastructure to cryptographically sign all IP-originated traffic at the network edge.

3. Core Mitigation Strategies

Coolwave Communications Limited employs a multi-layered defense strategy to ensure illegal traffic does not originate from, or transit through, our network.

A. Advanced Know Your Customer (KYC) Protocols

We prevent illegal robocalling at the source by vetting all clients before providing service:

- **Identity Verification:** We require valid business registration, tax IDs, physical address verification, and director history and anti-money laundering checks.
- **Traffic Profile Analysis:** New customers must provide their expected call volume, use case (e.g., telemarketing, alerts, customer service), and source of consent.
- **Vetting of Resellers:** We require downstream providers to certify they have their own KYC checks in place.

- **Upstream/Downstream Accountability:** We maintain records of the 'ultimate' source of traffic for all wholesale clients and require customers to identify any third-party dialers used in their campaigns.

B. Real-Time Network Monitoring

- **Anomalous Pattern Detection:** Our systems flag "short-duration" calls, high call-completion failure rates, and bursts of high-volume traffic from a single source.
- **Analytics Integration:** Our systems assign risk scores to outbound traffic.
- **Automatic Thresholds:** Accounts exceeding a specific "calls-per-second" (CPS) threshold without prior authorization are automatically throttled or suspended.

C. Caller ID Integrity

- **Unauthorized Number Prevention:** We prohibit customers from "spoofing" numbers they do not own or have the legal right to use.
 - **Attestation Levels:** We strictly apply **A, B, or C** attestations based on our confidence in the caller's identity and their right to use the telephone number.
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4. Traceback Cooperation & Enforcement

Coolwave Communications Limited recognizes that rapid response is the key to stopping active campaigns.

- **24-Hour Response:** We commit to responding to all **Industry Traceback Group (ITG)** requests within 24 hours.
 - **Upstream Investigation:** If illegal traffic is identified, we trace it to the point of origin and take immediate action.
 - **Zero Tolerance Policy:** Any customer found to be intentionally originating illegal robocalls will have their services terminated immediately without a refund.
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5. Foreign Provider Compliance:

As a foreign voice service provider, Coolwave Communications Limited expressly commits to complying with all FCC requests for information regarding illegal robocalls and to maintaining a registered agent for service of process in the United States. (Registered Agents Inc., 1717 N Street NW STE 1, Washington, DC, 20036, US).

6. Continuous Improvement

Our compliance officer reviews our mitigation effectiveness quarterly. This includes:

1. Updating blocked number lists based on FCC and FTC "Do Not Call" data.
2. Refining monitoring algorithms to catch evolving "scam" tactics (e.g., neighbor spoofing).
3. Ensuring all software patches for STIR/SHAKEN controllers are current.

7. Certification and Attestation

I, David Williams, certify that I am an officer of Coolwave Communications Limited and that I have personal knowledge of the facts contained in this Robocall Mitigation Plan. I certify that Coolwave Communications Limited has implemented the STIR/SHAKEN authentication framework as described herein, supported by NUSO, and is in full compliance with 47 CFR § 64.6305. I acknowledge that any false or inaccurate statement in this plan may result in a forfeiture of at least \$10,000 per violation and/or removal from the Robocall Mitigation Database.

Signature: David Williams Date: 27 February 2026