

Robocall Mitigation Program – Advanced Info LTDA

1. Company Role & Scope

Advanced Info LTDA is the responsible voice service provider for **all** traffic it originates or enables on its network. Advanced implements **caller ID authentication (STIR/SHAKEN)** across its **entire** originating network and maintains full operational, contractual, and compliance responsibility for its customers and call flows.

2. STIR/SHAKEN Implementation (47 CFR § 64.6301)

Advanced has **fully implemented** the STIR/SHAKEN authentication framework on **100%** of its originating network. All outbound calls that Advanced originates are **signed in compliance with 47 CFR § 64.6301**, with appropriate attestation levels, certificate management, secure key handling, and end-to-end operational controls. Advanced continuously monitors signing success rates, PASSporT integrity, attestation accuracy, and downstream verification outcomes to ensure ongoing compliance.

3. Robocall Mitigation Program (47 CFR § 64.6305(a))

In addition to full STIR/SHAKEN deployment, Advanced maintains a structured robocall mitigation program that includes:

- **Customer vetting & KYC** prior to activation (business validation, use-case review, sanctions screening).
- **Contractual prohibitions** against illegal robocalling, unwanted prerecorded campaigns, ANI/CNAM spoofing, and abusive behaviors; explicit enforcement rights to suspend/terminate service.
- **Continuous traffic analytics** to detect high-risk behaviors (e.g., abnormal CPS, short-duration bursts, low ASR/ACD outliers, high invalid/UA codes, suspicious A-numbers, and high-risk destinations).
- **Automated and manual controls** for rate limiting, call blocking, and immediate suspension of offending accounts, with escalation paths and root-cause analysis.
- **Preservation of logs/records** necessary to support traceback, investigations, and enforcement actions.

4. Traceback Response & Cooperation (24-hour commitment)

Advanced commits to respond **fully and within 24 hours** to all traceback requests from:

- The **Federal Communications Commission (FCC)**
- **Law enforcement agencies**
- The **Industry Traceback Group (ITG)**

Advanced cooperates promptly to identify and stop any illegal robocall sources and provides requested records subject to applicable laws.

5. Ongoing Governance & Controls

- **Certificate Lifecycle & Security:** Secure storage/rotation of private keys, timely certificate renewals, and role-based access controls consistent with STIR/SHAKEN governance requirements.
- **Attestation Policy:** Calls are assigned **A/B/C attestation** according to validated customer identity, number assignment rights, and call origination context; policies are periodically reviewed.
- **Monitoring & Reporting:** KPIs (signing success, verification pass rates, traceback SLAs, enforcement actions) are tracked and reviewed by compliance and engineering leadership.
- **Training & Awareness:** Provisioning, NOC, fraud, and compliance teams receive treinamento periódico sobre STIR/SHAKEN e obrigações anti-robocall.

6. Compliance Statement

Advanced certifies that:

- No prior certification by **Advanced Info LTDA** has been **removed** by Commission action.
- Advanced is **not prohibited** from filing in the Robocall Mitigation Database.
- Advanced has **fully implemented STIR/SHAKEN** across its entire originating network and **all originated calls comply** with **47 CFR § 64.6301**.
- Advanced maintains **robust fraud prevention and mitigation controls** in accordance with **47 CFR § 64.6305(a)** and will keep this filing accurate and current, updating promptly upon material changes.