

Robocall Mitigation Program Description

Company Overview

Plustel Limited is a United Kingdom-based wholesale voice service provider. The company provides VoIP services to approved business partners, who in turn provide services to business end users. The company originates voice traffic from outside the United States. Calls destined for the United States are transmitted to a US-based carrier partner for onward routing and termination.

The company does not operate a US domestic voice network.

The company does not provide services directly to residential consumers and does not provide open-access or anonymous retail voice services.

Commitment to Compliance

The company maintains a robocall mitigation program consistent with 47 CFR § 64.6305 and commits to:

- Taking reasonable steps to prevent the origination of illegal robocall traffic.
- Responding fully and within 24 hours to all traceback requests from the Commission, law enforcement agencies, and the Industry Traceback Group.
- Cooperating with investigations and taking immediate corrective action when unlawful traffic is identified.

The company maintains a zero-tolerance policy toward illegal robocalling, caller ID spoofing, or traffic that violates applicable US laws, including the Telephone Consumer Protection Act (TCPA).

Customer Vetting Procedures

The company applies risk-based onboarding controls to all wholesale customers, including:

- Collection and verification of corporate registration documents.
- Screening against sanctions and known high-risk entity databases.
- Confirmation of intended use case for outbound voice services.
- Execution of contractual agreements prohibiting illegal robocalling, caller ID spoofing, and unlawful telemarketing activity.

High-risk applicants may be subject to enhanced due diligence or declined.

Traffic Monitoring and Analytics

The company implements ongoing monitoring of outbound traffic patterns, including:

- Monitoring of call volume spikes.
- Analysis of short-duration call ratios.
- Review of abnormal answer-seizure ratios (ASR).
- Monitoring of high-velocity dialling behaviour.

Traffic exceeding predefined risk thresholds is flagged for manual review.

Complaint Handling and Traceback Response

The company maintains internal procedures for handling complaints and traceback requests, including:

- A designated compliance contact for all regulatory and traceback enquiries. **Kevin Godwin – support@plustel.co.uk**
- Capability to identify the originating customer associated with any call record.
- Retention of call detail records (CDRs) sufficient to support traceback investigations.
- Commitment to respond fully and substantively to all traceback requests within 24 hours and to take immediate mitigation action where unlawful traffic is identified.

If illegal traffic is identified, the company will:

- Immediately investigate the source.
- Suspend or terminate the responsible customer where appropriate.
- Cooperate with downstream and upstream carriers to prevent recurrence.

Upstream Carrier Coordination

Calls destined to the United States are transmitted to a US-based carrier partner that is responsible for STIR/SHAKEN authentication within the United States. The company cooperates with its carrier partners in preventing and mitigating unlawful traffic.

Record Retention

Call detail records are retained for a minimum of three years and customer onboarding documentation is retained for the duration of the customer relationship and a reasonable period thereafter to support traceback and regulatory enquiries.