



March, 2026

## **Robocall Mitigation Plan**

### **WMMN LTD**

#### **1. Introduction**

In accordance with the Federal Communications Commission's (FCC) Sixth Caller ID Authentication Report and Order and the rules contained in 47 C.F.R. §§ 64.6303–64.6305, voice service providers that originate or transmit traffic to the United States must maintain and implement a Robocall Mitigation Plan (RMP) and certify their compliance in the FCC Robocall Mitigation Database (RMD).

These regulations apply to both domestic and foreign voice providers whose traffic enters U.S. networks. Providers must ensure that the traffic they originate, transmit, or process is subject to procedures designed to prevent illegal robocalls and caller ID spoofing.

Under these rules, providers must, among other things:

- Implement reasonable safeguards to prevent unlawful robocall activity, including appropriate Know Your Customer (KYC) verification procedures.
- Respond within 24 hours to traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Group (ITG).
- Fully cooperate with investigations aimed at identifying and stopping illegal robocall traffic.

This document outlines the policies and technical measures adopted by WMMN LTD to detect, prevent, and mitigate unlawful robocall traffic and to ensure compliance with all applicable FCC rules.

WMMN LTD further commits to updating its RMD filing within ten (10) business days of any material change to the company's information, as required by FCC rules, and to certifying its RMD certification annually in accordance with FCC requirements.

WMMN LTD also certifies that no previous RMD certification filed by the company has been removed or revoked by the FCC.

#### **2. Company Overview**

WMMN LTD is a telecommunications company incorporated in Gibraltar that operates in the international wholesale voice and VoIP market.

**Principals, Affiliates, Subsidiaries, and Parent Companies:**

WMMN LTD operates as an independent legal entity and does not have any parent company, subsidiaries, affiliates, or sister companies

**Principal:** Houssam Berry – Director

### **3. STIR/SHAKEN Call Authentication**

As a foreign voice service provider, WMMN LTD is not currently required to obtain an STI-PA Service Provider Code (SPC) token or directly sign calls within the STIR/SHAKEN authentication framework used by U.S. domestic carriers, however, WMMN LTD maintains a comprehensive Robocall Mitigation Program and follows industry best practices to reduce the risk of illegal robocalls entering U.S. networks.

### **4. Customer Due Diligence and KYC Process**

Before enabling service for any new customer or partner, WMMN LTD conducts a Know Your Customer (KYC) verification process.

During onboarding, each prospective customer must provide corporate and regulatory information including:

- Legal company name and any trade names
- Country of incorporation
- Tax identification or VAT number
- Registered business address
- Contact information

WMMN LTD verifies the provided information by reviewing corporate registration records, online presence, and publicly available information relating to the customer's business activities.

Only customers that successfully pass this verification process are permitted to establish service.

All KYC records and documentation are securely retained for compliance and audit purposes.

#### **Customer Compliance Certification**

As part of the onboarding process, WMMN LTD requires all customers sending U.S traffic to acknowledge and agree to comply with applicable laws governing outbound calling activities. Customers must certify that they:

- Comply with all applicable U.S. telecommunications laws and FCC regulations
- Do not originate or transmit illegal robocalls
- Will cooperate with traceback investigations
- Will take prompt action if unlawful traffic is identified on their network

Failure to comply with these obligations may result in immediate suspension or termination of service.

## **5. Acceptance of Traffic from RMD Listed Providers**

When WMMN LTD acts as an intermediate voice service provider, the company accepts U.S.-bound traffic only from upstream providers or customers that are properly registered in the FCC Robocall Mitigation Database (RMD).

## **6. Response to FCC Enforcement Notifications**

If WMMN LTD receives a notification from the FCC Enforcement Bureau indicating that traffic on its network may be linked to illegal robocalling activity, the company will promptly initiate an internal investigation and take appropriate corrective actions.

## **7. Network Monitoring and Traffic Analysis**

WMMN LTD continuously monitors network activity to identify potential indicators of robocalling or abnormal traffic patterns.

For network operations and traffic monitoring, WMMN LTD utilizes VeriSwitch softswitch platform, which provides advanced routing control, call analytics, and fraud prevention tools designed to detect and mitigate suspicious voice traffic. Monitoring activities include the review and analysis of:

- Call Detail Records (CDRs)
- Call duration patterns
- Unusual call volume spikes
- Answer Seizure Ratio (ASR)
- Average Call Duration (ACD)
- Post Dial Delay (PDD)

VeriSwitch platform also supports additional network protection mechanisms, including:

- Do-Not-Originate (DNO) list filtering, used to prevent calls from numbers that should never originate outbound traffic
- Configurable routing and blocking policies
- Real-time traffic monitoring and alerting
- Fraud detection and traffic anomaly identification tools

If suspicious or unlawful activity is identified, WMMN LTD may take immediate mitigation actions, which may include blocking numbers, suspending routes, restricting customer traffic, or implementing additional filtering measures while the investigation is ongoing.

## **8. Traceback Investigation Procedures**

WMMN LTD fully cooperates with traceback requests received from the FCC, the Industry Traceback Group (ITG) and any other law enforcement authorities.

Upon receiving a traceback request, the company will:

- Response to traceback inquiries within 24 hours.
- Identify the upstream provider or customer responsible for the traffic.
- Investigate
- Take appropriate action if unlawful activity is confirmed

**Traceback Point of Contact**

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