



Robocall Mitigation Program

USA Mobile LLC is a Mobile Virtual Network Operator (MVNO) that provides wireless voice and data telecommunications services to subscribers in the United States. USA Mobile provides service to end users through wholesale network arrangements with underlying facilities-based carriers.

USA Mobile operates using the network infrastructure of AT&T through its network partner BlueConnects. Subscriber provisioning, billing, and operational support systems are managed through the Telgoo5 BSS/OSS platform.

USA Mobile maintains a robocall mitigation program designed to reduce the likelihood that illegal robocall traffic will originate from its services. This program is implemented in accordance with the Federal Communications Commission's robocall mitigation requirements under 47 CFR § 64.6305.

Network Architecture

USA Mobile does not operate its own switching infrastructure or telecommunications transport network. Voice traffic originating from USA Mobile subscribers is transmitted through the network infrastructure of AT&T via BlueConnects.

Subscriber provisioning, account management, billing operations, and service lifecycle management are conducted through the Telgoo5 BSS/OSS platform.

Voice call flow generally follows the structure below:

Subscriber Device

- USA Mobile Service Platform
- Telgoo5 BSS/OSS
- BlueConnects Network Infrastructure
- AT&T Network
- Public Switched Telephone Network

As an MVNO, USA Mobile relies on the underlying facilities-based carrier network to perform network-level call authentication and routing.

STIR/SHAKEN Implementation

USA Mobile does not directly implement the STIR/SHAKEN call authentication framework within its own network infrastructure. STIR/SHAKEN authentication is implemented by the underlying facilities-based carrier network (AT&T) through the BlueConnects network infrastructure.

USA Mobile relies on the STIR/SHAKEN implementation of its underlying carrier partner to authenticate calls originating from USA Mobile subscribers. In addition to this carrier-level authentication, USA Mobile maintains its own robocall mitigation program and monitoring processes to prevent the use of its services for illegal robocall activity.

USA Mobile does not originate bulk voice traffic or high-volume automated calling services.

Robocall Mitigation Policies

USA Mobile strictly prohibits the use of its telecommunications services for illegal robocalling, caller ID spoofing, or any activity that violates applicable telecommunications laws and regulations, including the Telephone Consumer Protection Act (TCPA), the TRACED Act, and Federal Communications Commission rules.

Subscribers, dealers, activation agents, and any distribution partners operating on the USA Mobile platform are required to comply with USA Mobile acceptable use policies and all applicable federal and state laws governing telecommunications and automated calling.

Any activity determined to involve illegal robocalling, spoofing, or fraudulent telecommunications traffic may result in immediate suspension or termination of service.

Subscriber and Activation Controls

USA Mobile employs multiple safeguards during the account activation and subscriber onboarding process to reduce the risk of fraudulent activity or robocall operations originating from its services.

These safeguards include:

- SIM activation procedures tied to device identifiers including IMEI and ICCID
- Payment verification and fraud screening during account activation, including automated payment processor fraud detection tools
- Account verification procedures prior to service activation
- Dealer and activation partner vetting prior to granting access to activation systems

These procedures help reduce the risk of high-volume fraudulent activations commonly associated with robocall operations.

Traffic Monitoring and Fraud Detection

USA Mobile maintains ongoing monitoring processes designed to detect abnormal or suspicious telecommunications activity.

These monitoring procedures include:

- Fraud detection alerts and monitoring tools available through the Telgoo5 BSS/OSS platform
- Carrier-level fraud monitoring provided through the underlying network partner
- Velocity monitoring designed to detect abnormal calling patterns or unusually high call volumes
- Automated flags for suspicious traffic behavior

Accounts exhibiting traffic patterns consistent with robocall activity, spoofing, or other fraudulent telecommunications conduct may be flagged for investigation.

Investigation and Enforcement Authority

USA Mobile reserves the right to investigate any subscriber account, dealer account, or traffic pattern that may indicate robocall activity, spoofing, or other telecommunications abuse.

USA Mobile may suspend, restrict, or terminate service during or following such investigations in order to prevent abuse of its services or network resources.

Distribution partners, activation agents, or dealers found to be in violation of USA Mobile acceptable use policies or applicable telecommunications laws may have their access to USA Mobile activation systems revoked.

Compliance and Operational Oversight

All telecommunications operations, compliance oversight, subscriber management, and regulatory responsibilities are maintained and administered by USA Mobile LLC.

USA Mobile is responsible for ensuring that all voice services provided through its platform comply with applicable FCC robocall mitigation requirements.

USA Mobile periodically reviews its robocall mitigation procedures and operational safeguards to ensure ongoing compliance with federal regulations and industry best practices.

Traceback Cooperation

USA Mobile commits to responding fully and within 24 hours to traceback requests from the Federal Communications Commission, law enforcement agencies, and the Industry Traceback Group.

USA Mobile will cooperate with such entities in identifying, investigating, and mitigating any suspected illegal robocall activity associated with its services.

Commitment to Regulatory Compliance

USA Mobile LLC remains committed to maintaining policies, procedures, and monitoring tools designed to prevent illegal robocall traffic from originating on its services.

USA Mobile's robocall mitigation program is maintained in accordance with applicable FCC regulations, including 47 CFR § 64.6305.

USA Mobile will update this robocall mitigation program as necessary to reflect operational changes, regulatory updates, or improvements to fraud detection and mitigation procedures.