

Robocall Mitigation Plan

Impulsora Balder, SA de CV

1. Executive Summary

This Robocall Mitigation Plan describes the measures used by Impulsora Balder, SA de CV in connection with VoIP services that may result in calls terminating in the United States.

The Company is a small voice provider based in Mexico. Its traffic originates from its own customers, including certain integrator-type customers that provide services to their own end users.

In such cases, end users connect directly to the Company's internally operated VoIP platform, and the Company retains technical visibility and control over traffic and account activity.

This plan describes reasonable steps to help prevent the origination or transmission of illegal robocalls.

2. Service Profile and Risk Context

The Company does not receive traffic from upstream carriers or wholesale providers. All outbound traffic originates from customer accounts provisioned on the Company's platform.

Some customers are integrators, but they are not upstream providers. The Company applies contractual controls through its agreements with integrators while retaining direct technical control over service delivery and traffic activity.

For U.S.-bound traffic, the Company can download and review call detail records (CDRs) for analysis in Excel.

3. Robocall Mitigation Measures

The Company's current mitigation measures include:

- Direct control over customer accounts on its internally operated VoIP platform
- Use of platform statistics and reporting tools
- Manual review of exported CDRs

These tools are used to identify patterns that may warrant investigation, including:

- Unusual traffic spikes
- Low average call duration (ACD)
- Abnormal answer-seizure ratio (ASR)
- Repetitive short-duration calls
- Calling patterns inconsistent with a customer's stated use

Where suspicious or potentially unlawful activity is detected, the Company may promptly restrict, block, suspend, or terminate service.

4. Customer Due Diligence (New and Renewing Customers)

The Company applies a risk-based customer due diligence process for new and renewing customers.

This includes:

- Basic business verification
- Confirmation of intended service use
- Identification of higher-risk customer profiles

Higher-risk profiles include integrator-type customers and customers expected to generate significant outbound traffic.

Renewing customers are reassessed periodically based on:

- Actual traffic behavior
- Consistency with the stated use case
- Prior compliance concerns

Customer and integrator agreements allow investigation and, where warranted, restriction, suspension, or termination of service.

5. Traffic Monitoring and Detection Triggers

The Company conducts ongoing review of traffic using platform statistics and exported CDR data analyzed in Excel.

Further investigation may be triggered by:

- Sudden changes in traffic volume
- Traffic inconsistent with the customer's stated use
- Unexpected international traffic patterns
- Indicators of potentially automated or unlawful calling behavior

6. Investigation and Enforcement Actions

When a trigger is identified, the Company reviews the relevant account, traffic history, and available CDR data.

The Company may contact the customer or the integrator to request explanation and supporting information.

If suspicious or unlawful activity is indicated, the Company may:

- Restrict service
- Block specific traffic
- Suspend the account
- Terminate service

In integrator scenarios, contractual enforcement is applied through the integrator, while technical enforcement is applied directly on the platform.

7. Alignment with FCC Expectations

This plan reflects a practical and proportionate robocall mitigation program based on the Company's actual role, business model, and available tools.

It describes reasonable steps to prevent illegal robocalls, includes customer due diligence, and provides for ongoing traffic monitoring and enforcement.

Because the Company presently has no upstream providers, no upstream-provider onboarding procedure is currently operative.

If that changes, appropriate review procedures will be implemented before accepting such traffic.

8. Statement of Commitment

Impulsora Balder, SA de CV is committed to applying reasonable, risk-based measures to prevent illegal robocalling, to investigating suspicious traffic promptly, and to taking appropriate enforcement action when warranted.