

LEXICO AMERICAS LLC

Robocall Mitigation Program Description

LEXICO AMERICAS LLC is a Non-Gateway Intermediate Provider that routes voice traffic between interconnected telecommunications providers. The company does not originate calls to end users, does not assign telephone numbers to customers, and does not obtain numbering resources directly from the North American Numbering Plan.

Pursuant to 47 CFR § 64.6305(c), LEXICO AMERICAS LLC is not subject to a STIR/SHAKEN implementation obligation. The company has not implemented STIR/SHAKEN and instead maintains a robocall mitigation program designed to prevent the transmission of illegal robocall traffic through its network.

The company implements reasonable measures to identify, investigate, and mitigate potentially unlawful traffic, including:

- Know Your Customer (KYC) review of business partners and customers;
- Review of traffic patterns and routing behavior;
- Investigation of complaints and suspicious traffic reports;
- Cooperation with upstream and downstream providers regarding traffic-related concerns;
- Immediate action when evidence of unlawful traffic is identified.

LEXICO AMERICAS LLC maintains records necessary to investigate suspected illegal robocall activity and supports traceback investigations conducted by the Federal Communications Commission, law enforcement agencies, and the Industry Traceback Group.

The company commits to respond fully and within 24 hours to all traceback requests received from the FCC, law enforcement agencies, and the Industry Traceback Group.

LEXICO AMERICAS LLC continuously reviews its traffic monitoring and compliance procedures and updates its robocall mitigation practices as necessary to comply with applicable FCC requirements.

Authorized Representative:

OLEKSANDR SHNEYDERIS

Director

LEXICO AMERICAS LLC