

Robocall Mitigation Program for LTE Wireless, Inc

This document details the Robocall Mitigation Program established by and for LTE Wireless, Inc, (LTEW) a facilities based wireless service provider.

Overview

By their nature of only having the capacity of two to three calls per subscriber as well as the inability of the subscriber to set arbitrary outgoing call information, mobile networks are generally not prone to the same robocalling abuse. Nevertheless, LTE Wireless takes robocall mitigation as serious as a full wholesale provider.

Methods Implemented

1. **Know Your Customer (KYC)** - LTEW requires subscribers to provide proper identification prior to subscriber account activation. Given the fact that most of LTEW are or will be users of the US Government Lifeline program, their identities have also been verified by those means.
2. **Contractual Requirements** - The LTEW subscriber contract specifically forbids the use of the service to autodial, harass, or spam call recipients.
3. **Caller ID Filtering** - By the nature of mobile networks, subscribers are not permitted to set arbitrary caller ID numbers on outgoing calls. Calls are automatically set to use the Caller ID associated with the subscriber line before the outgoing call is passed to upstream carriers.
4. **CDR Analysis** - Call logs are analyzed to spot any out of the ordinary traffic patterns, such as rapid continuous dialing, that may indicate the subscriber line has been attached to a robocalling system via a SIM gateway.
5. **STIR/SHAKEN** - LTEW will fully participate in the STIR/SHAKEN call authentication system. This will allow destination networks to identify suspicious calls and request tracebacks and call history from LTEW.

Investigations

1. **Tracebacks** - When a traceback request is sent to LTEW, administration will make every effort to respond to the request within 24 hours. This will

give LTEW the opportunity to contact the subscriber and request documentation about the validity and legality of the suspicious call.

- 2. Law Enforcement** - LTEW will work with jurisdictionally appropriate Law Enforcement Agencies within the bounds of the law to provide information and evidence of illegal robocalling.
- 3. Internal Investigations** - Even in absence of a traceback request or valid legal request, unusual and suspicious call patterns will be investigated by LTEW support personnel.

Enforcement

Upon the discovery of suspicious traffic, LTEW support personnel will make every effort to contact the subscriber in question. In the event the traffic is found to violate laws or LTEW policies or if the subscriber fails to provide requested documentation, LTEW reserves the right to automatically mitigate the traffic, using methods including but not limited to:

- Call rate filtering
- Destination filtering
- Account termination without refund

This plan respectfully submitted 2 Jun, 2026