

ROBOCALL MITIGATION PLAN (RMP)

Company: Quantum Core Techno S.R.L. (DBA: QCoreT)

FCC Registration Number (FRN): 0038502258

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1. Introduction and Regulatory Commitment

Quantum Core Techno S.R.L. (hereinafter "QCoreT") is strictly committed to preventing illegal and spoofed robocalls from originating on or passing through our network. QCoreT recognizes and operates in accordance with the Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act and the policies established by the Federal Communications Commission (FCC).

As a foreign interconnected VoIP Service Provider, QCoreT is actively evaluating the implementation of the STIR/SHAKEN caller ID authentication framework. Until our own cryptographic implementation is fully deployed, we rely on our downstream U.S. Gateway Providers to authenticate traffic, and we fully comply with the stringent mitigation measures outlined in this Robocall Mitigation Plan.

2. Customer Vetting and KYC (Know Your Customer)

Before provisioning any SIP trunk or DID services, QCoreT implements a rigorous onboarding and continuous vetting process to ensure the absolute legitimacy of the entity:

- **Corporate and Identity Validation:** We independently collect and verify corporate registration documents, tax identification numbers, and the physical addresses of all prospective clients.
- **Industry Legality Verification:** We conduct thorough due diligence to confirm that the client's stated industry and use-case comply with all applicable local and U.S. telecommunications regulations.
- **Acceptable Use Policy (AUP) and Contractual Enforcement:** All clients are legally required to sign a Terms of Service (ToS) agreement that includes a strict AUP. This explicitly prohibits the transmission of illegal robocalls, Caller ID spoofing, and unsolicited telemarketing spam. Compliance with these terms is continuously monitored and legally enforceable.

3. Specific Reasonable Steps and Live Traffic Monitoring

QCoreT utilizes advanced monitoring tools within our ASTPP and FreeSWITCH infrastructure to analyze live outbound traffic destined for the United States. Our specific, reasonable mitigation steps include:

- **Dynamic Anomalous Traffic Thresholds:** We enforce dynamic statistical thresholds for Answer Seizure Ratio (ASR), Average Length of Call (ALOC), and Calls Per Second (CPS) spikes. Any significant deviation immediately triggers automated alerts for our compliance operations team.

- **Proactive Caller ID Verification & Spoofing Prevention:** We implement automated controls within our routing engine to ensure the Caller ID transmitted by clients strictly matches the DIDs explicitly assigned or authorized to them. Unauthorized spoofing attempts result in immediate call blocking.
- **Do-Not-Originate (DNO) Implementation:** QCoreT is committed to implementing call blocking based on a reasonable "Do-Not-Originate" (DNO) list to prevent the routing of calls originating from invalid, unallocated, or explicitly restricted numbers.

4. Graduated Enforcement and Incident Response

When our detection systems flag anomalous behavior, QCoreT enforces a strict and automated mitigation policy:

1. **Automated Warning:** Dispatch of an immediate alert requesting justification of the traffic.
2. **Temporary Call Blocking:** Automatic suspension of the client's outbound SIP trunk if anomalous traffic persists or justification is insufficient, protecting the downstream network.
3. **Permanent Account Termination:** Willful violation of our AUP or FCC regulations results in immediate, permanent account closure and blacklisting.

5. Traceback Cooperation Commitment

QCoreT is fully committed to aggressive cooperation with law enforcement and regulatory bodies. We maintain comprehensive Call Detail Records (CDRs) for all network traffic.

QCoreT explicitly commits to respond fully and completely, within 24 hours of receipt, to all traceback requests from the Federal Communications Commission (FCC), law enforcement agencies, and the US Telecom Industry Traceback Group (ITG), and to cooperate fully with such entities in investigating and stopping any illegal robocallers.

6. Annual Recertification

QCoreT formally commits to submitting the mandatory annual recertification to the FCC's Robocall Mitigation Database (RMD), ensuring that all operational and compliance information remains accurate, transparent, and up-to-date.