

Connecta Satellite Solutions, LLC's Robocall Mitigation Plan

Connecta Satellite Solutions, LLC ("Connecta") submits this Robocall Mitigation Plan ("Plan") pursuant to 47 C.F.R. § 64.6305. This Plan describes Connecta's efforts to mitigate illegal robocalls consistent with the FCC's rules. Connecta may modify, add, delete, or otherwise alter any part of this Plan in order to respond to changes in its business, technologies, needs, industry best practices, or any applicable law or regulations. Connecta will update this Plan within ten (10) business days following the date of any changes to the Plan.

STIR/SHAKEN Implementation Status

Connecta is a voice service provider that provides resold voice services to end-users by resale of satellite and mobile voice services. Although Connecta is a voice service provider that has direct relationships with end-user customers, Connecta exclusively resells voice services that have been obtained from underlying wholesale providers. Connecta does not operate its own voice switches and does not operate switches leased from another entity to provide its resold voice services. Nor does Connecta control number porting or call trunking associated with calls originating from, or terminating to, Connecta's customers. As such, Connecta "lack[s] control over the necessary network infrastructure to implement STIR/SHAKEN" and does not have a STIR/SHAKEN implementation obligation.¹

Vetting Process for New and Renewing Customers

Connecta collects personal identification information including name, billing address and email address that are designed to confirm the identity of the user upon sign-up and/or renewal of service.

Terms of Use/Acceptable Use Policies to Mitigate Carrying Robocalls

Connecta's agreements with customers prohibit use of service for illegal purposes and reserve the right for Connecta to terminate service upon discovery of unlawful or abusive use.

Upstream Provider Vetting Process

Connecta relies on a limited number of underlying wholesale providers for handling calls that originate from, or terminate to, Connecta's end-user customers. Before partnering with any upstream wholesale providers, Connecta obtains information on the wholesale provider's physical address, contact person, state or country of incorporation, federal tax ID (if applicable), the nature of their business, and whether the upstream provider is identified in the FCC's Robocall Mitigation

¹ See *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources*, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, 3260, ¶ 40 (2020) (excluding from a STIR/SHAKEN implementation obligation those providers that lack control over the necessary network infrastructure); See *Call Authentication Trust Anchor*, Second Report and Order, 36 FCC Rcd 1859, 1868, ¶ 19 (2020).

Database. Connecta only partners with upstream providers if they have a filing in the Robocall Mitigation Database and that filing has not been de-listed pursuant to an enforcement action.

Call Authentication, Monitoring, and Mitigation

As a reseller of services obtained from a limited number of underlying wholesale carriers, Connecta relies on its underlying wholesale providers for authenticating, monitoring and mitigating calls that originate from, or terminate to, Connecta's end-user customers. Connecta relies on its providers' call analytics systems to identify and mitigate unlawful or suspected robocall traffic originated by Connecta's customers.

To the extent that a wholesale provider to Connecta identifies suspicious traffic patterns originating from a Connecta customer, Connecta will investigate suspected robocall traffic and will take necessary action including termination of service.

Traceback Commitments

Connecta commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use Connecta's service to originate, carry, or process illegal robocalls.

Ownership and Management

Connecta has the following parent company: SPS Holding Company LLC

Connecta and SPS Holding Company LLC have the following principals:

Marlos Barbosa, Chief Executive Officer
Carin Thomley, Chief Financial Officer
Britt Wehrman, Senior Vice President of Marketing and Sales
Henaa Blanco, Manager
Christopher Hughes, Manager
James Goodman, Manager
John Harrison, Manager