

ROBOCALL MITIGATION PLAN

Initial FCC Robocall Mitigation Database Filing | Voice Service Provider / MVNO

Legal business name	North American Local, LLC
Other or former names	None
Business-type FCC FRN	0020945580
RMD number	Not assigned; initial filing
Primary address	10447 Sorrento Road, #79, Pensacola, FL 32507
Provider category	Voice service provider and Mobile Virtual Network Operator (MVNO)
Service model	Direct service to retail end users; no wholesale service
Foreign provider	No
OCN	None
Plan version	1.0
Effective date	08.10.2026
Responsible officer	Jorge Bellas, Managing Partner

Purpose and Regulatory Commitment

North American Local adopts this plan to document the reasonable and effective steps it uses to prevent its services from being used to originate illegal robocall traffic. The plan addresses customer due diligence, upstream-provider oversight, call analytics, blocking, traceback response, recordkeeping, and cooperation with the Federal Communications Commission, law enforcement, and the industry traceback consortium.

North American Local intends this plan to support its initial filing in the FCC Robocall Mitigation Database under 47 CFR 64.6305. The company will maintain the plan as an active operating document and will revise its RMD filing when reportable information changes.

Provider Profile and Call-Path Role

North American Local is a domestic MVNO that provides voice service directly to retail end users using North American Numbering Plan resources. It does not provide wholesale voice service and does not authorize customers to use the service for high-volume or automated outbound calling.

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The company identifies Jorge Bellas, Managing Partner, as its individual principal. No parent company, subsidiary, affiliate, DBA, former business name, or OCN has been reported for this filing. These representations must be updated before submission if the company's ownership or business-name information differs.

Compliance Ownership and Contacts

Robocall compliance contact	Priscilla Jackson, Manager, Operations
Business address	10447 Sorrento Road, #79, Pensacola, FL 32507
Telephone	850-221-1664
Email	priscilla@northamericanlocal.com
Traceback inbox	support@northamericanlocal.com

Priscilla Jackson coordinates implementation of this plan, receives internal escalations, works with 321 Communications and other vendors, and ensures that traceback requests and suspected illegal traffic are addressed promptly. The support inbox is the designated address for traceback requests and related notices.

STIR/SHAKEN and Underlying Carrier

321 Communications is North American Local's underlying wireless and voice carrier. North American Local does not independently operate or control the network infrastructure used to generate STIR/SHAKEN signatures. The underlying carrier performs STIR/SHAKEN authentication of outgoing calls on North American Local's behalf and provides the network-level monitoring used to identify suspicious robocall activity.

Before the initial RMD submission, North American Local will obtain written confirmation from 321 Communications identifying whether all eligible calls are signed, whose certificate is used, how attestation decisions are made, and whether the correct portal certification is full implementation, partial implementation, or no independent implementation because North American Local lacks control of the relevant network infrastructure.

North American Local will not represent a level of STIR/SHAKEN implementation in the RMD unless that representation is supported by the company's actual network arrangements and written information received from 321 Communications.

Know-Your-Customer and Activation Controls

Before activating or renewing service, North American Local collects and reviews the customer's full name, service and billing address, telephone number, email address, and applicable payment or account information. The company reviews this information for completeness, inconsistencies, duplicate accounts, and other indicators of potential fraud or misuse.

Customers must accept service terms prohibiting caller ID spoofing, illegal robocalls, fraudulent activity, and other unlawful use of the service. Accounts presenting inconsistent, incomplete, or suspicious information may be placed under manual review and may require additional documentation or identity verification. North American Local will not activate service when the customer's identity or account information cannot be reasonably verified.

After activation, suspicious account activity or abnormal calling patterns may result in additional verification, restriction, suspension, or termination. These controls are intended to satisfy the company's obligation to take affirmative and effective measures to prevent new and renewing customers from using its services to originate illegal calls.

Service Restrictions and Acceptable Use

North American Local does not authorize high-volume or automated outbound calling. Its retail service is not marketed or configured as a mass-calling, predictive-dialing, or robocalling service. Use of the service to transmit unlawful prerecorded messages, spoof caller identification, impersonate another party, or conduct fraudulent campaigns is prohibited.

Activity inconsistent with ordinary retail use may trigger investigation, blocking, account restriction, re-verification, suspension, or termination. North American Local may require the customer to provide an explanation and documentation supporting the lawfulness of the traffic before restrictions are lifted.

Upstream Provider Due Diligence

North American Local receives underlying carrier and network services from 321 Communications. Before using or continuing to use an upstream voice provider, North American Local will confirm that the provider has an active filing in the FCC Robocall Mitigation Database and has not been removed through an enforcement action.

North American Local will maintain current contact and escalation information for 321 Communications, understand the division of responsibility for STIR/SHAKEN signing and call analytics, and seek prompt support when suspicious or potentially illegal traffic is identified. If the company adds or replaces an upstream provider, it will perform equivalent due diligence and update the RMD filing when required.

Traffic Monitoring and Analytics

321 Communications provides the network-level monitoring and analytics used for North American Local's traffic. North American Local relies on the carrier to identify call patterns that may indicate spoofing, fraud, high-volume automated calling, or other illegal robocall activity and to apply network controls when suspicious traffic is detected.

North American Local supplements carrier monitoring with customer account information, activation data, customer complaints, call-center observations, and account history maintained through its CRM and customer-service processes. Potential indicators include unexpected spikes in outbound volume, repeated short-duration calls, customer complaints, inaccurate account information, suspicious caller ID use, and traffic inconsistent with ordinary retail service.

North American Local does not operate a separate in-house robocall analytics platform and has not identified a separate third-party analytics vendor. It relies on the network-level monitoring and analytics supplied by 321 Communications and will update its RMD filing if that arrangement or the identity of an analytics provider changes.

Detection, Investigation, and Blocking

Detection. Suspicious traffic may be identified by 321 Communications, North American Local personnel, Paricus LLC customer-service agents, customer complaints, traceback requests, or notices from the FCC or law enforcement.

Immediate mitigation. When suspicious traffic is detected, the affected traffic is blocked. North American Local will coordinate with 321 Communications to stop the traffic, identify the associated account, and prevent substantially similar traffic from continuing while the matter is reviewed.

Account review. North American Local may examine activation records, account information, complaint history, payment information, and available call data. The company may request additional documentation from the customer and may restrict, suspend, or terminate the account when the activity cannot be validated as lawful.

Escalation and cooperation. Confirmed or suspected illegal activity will be escalated to Priscilla Jackson and, when appropriate, to 321 Communications, the FCC, law enforcement, or the industry traceback consortium. Relevant information will be preserved and provided in accordance with applicable law and regulatory requests.

Traceback Response

North American Local commits to respond fully within 24 hours to traceback requests from the FCC, civil or criminal law enforcement, and the industry traceback consortium. Requests should be sent to support@northamericanlocal.com and will be escalated to Priscilla Jackson in Operations.

The response process includes identifying the relevant subscriber or account, confirming the call path and underlying carrier, coordinating with 321 Communications, preserving responsive records, identifying the provider from which traffic was received when applicable, and supplying complete and accurate information within the required response period.

North American Local will cooperate with traceback and enforcement entities in investigating and stopping illegal robocallers that use its service. The company will maintain sufficient internal coverage so that the designated inbox is reviewed and requests are not dependent on a single employee's availability.

Customer Complaints and Call-Center Escalation

Paricus LLC provides customer-service call-center services. Customer complaints or agent observations suggesting spoofing, fraud, automated calling, or other suspicious activity will be documented and escalated through North American Local's support process. The account may be restricted while the matter is investigated.

Customer-service personnel will route robocall-related complaints and government or industry inquiries to Priscilla Jackson and the traceback inbox. Complaint information may be compared with carrier analytics and account activity to determine whether blocking, suspension, termination, or other corrective action is warranted.

Systems and Service Providers

Provider	Role
321 Communications	Underlying carrier; STIR/SHAKEN signing; network-level robocall monitoring and analytics; traffic blocking support
Unavo Inc.	Customer relationship management platform used for customer and account information; legal name must be confirmed before filing
Paricus LLC	Customer-service call center; complaint intake, documentation, and escalation

North American Local remains responsible for the accuracy of its RMD filing and the effectiveness of its mitigation program even when operational functions are performed by vendors or the underlying carrier.

Training, Records, and Plan Review

Personnel and contractors with relevant responsibilities will receive instruction appropriate to their roles, including recognizing suspicious activity, documenting complaints, escalating traceback requests, protecting customer information, and applying account restrictions. North American Local will maintain records sufficient to demonstrate implementation of this plan and to respond to traceback and regulatory inquiries.

The plan owner will review this document when the company changes carriers, analytics vendors, customer-verification procedures, service offerings, traceback contacts, ownership information, or other material operating practices. The company will also review the plan before each annual RMD recertification.

Regulatory and Enforcement Disclosures

North American Local reports that, during the two years preceding this initial filing, neither the company nor any entity identified by the company as sharing common ownership, management, directors, or control has been the subject of a formal FCC, law-enforcement, or regulatory action or investigation with findings of actual or suspected wrongdoing involving illegal robocalls, spoofing, or a deficient RMD certification or mitigation-plan description.

This statement must be rechecked immediately before filing. If any responsive action or investigation exists, the RMD filing must describe the agencies involved, commencement date, status, findings, and any final determination.

RMD Updates and Annual Recertification

North American Local will update its RMD filing within 10 business days after information required by the FCC changes. The company will also recertify annually, on or before March 1, that the information in its RMD filing is true and correct. The initial filing and each recertification will be reviewed and signed by an authorized officer.

The company will maintain a business-type FRN in CORES, use the FCC's required authentication controls to access the RMD, and preserve the final submission confirmation and current public RMD record.

Officer Certification and Adoption

I, Jorge Bellas, Managing Partner of North American Local, LLC, certify that I have reviewed this Robocall Mitigation Plan and that, after completion of the highlighted filing items, it accurately describes the company's robocall mitigation practices and commitments. I declare under penalty of perjury that the foregoing is true and correct. This plan is adopted as an operating policy of North American Local.

Signature of officer

Jorge Bellas, Managing Partner

Execution Date: 08/10/2026

North American Local, LLC

Regulatory References

47 CFR 64.6305(a) and (d), robocall mitigation program and RMD certification requirements for voice service providers; 47 CFR 64.1200(n)(1), 24-hour traceback response; 47 CFR 64.1200(n)(4), customer due diligence; and 47 CFR 1.16, officer certification under penalty of perjury.