

MAXTEL LLC

ROBOCALL MITIGATION PLAN

Prepared Pursuant to 47 C.F.R. Part 64, Subpart JJ

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Provider Classification	Combined Gateway Provider and Voice Service Provider

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1. Purpose and Regulatory Basis

This Robocall Mitigation Plan (“Plan”) sets out the practices Maxtel LLC (“Maxtel” or the “Company”) follows to keep its network from being used to originate, carry, or terminate illegal robocalls. It is prepared to satisfy the robocall mitigation program requirements adopted by the Federal Communications Commission (“FCC” or “Commission”) at 47 C.F.R. §§ 64.6300–64.6305, and it reflects Maxtel’s obligations as a provider that both originates voice traffic for its own customers and receives traffic on behalf of upstream partners for delivery into the U.S. public switched network.

Terms used in this Plan carry the meanings assigned to them under 47 C.F.R. § 64.6300 unless a different meaning is given here. Where this Plan describes an obligation imposed directly by rule, a citation to the applicable Commission regulation is provided in a footnote-style parenthetical for ease of reference.

2. Company Overview

Maxtel LLC is a limited liability company organized under the laws of the State of Wyoming. Maxtel provides **VoIP and cloud communications services, wholesale voice termination, and enterprise AI-enabled communications solutions** to business and carrier customers on a domestic and international basis.

Depending on the specific service and the direction of a given call, Maxtel may function as a *Voice Service Provider* (originating calls for its own retail or wholesale customers), a *Gateway Provider* (accepting foreign-originated calls using North American Numbering Plan resources and injecting them into the U.S. network), or both simultaneously with respect to different traffic on its network.

3. Provider Classification and Caller ID Authentication Status

Maxtel is filing as a **Combined Gateway Provider and Voice Service Provider** in the RMD.

With respect to STIR/SHAKEN caller ID authentication, Maxtel has **fully implemented the STIR/SHAKEN authentication framework across its entire network**, and all calls that Maxtel originates are authenticated consistent with 47 C.F.R. § 64.6301. Maxtel signs calls with its own STIR/SHAKEN certificate, obtained using its own Service Provider Code (SPC) token, and makes its own attestation-level decisions on a per-call basis. (*See 47 C.F.R. § 64.6301 (STIR/SHAKEN implementation).*)

4. Governance and Compliance Contact

Maxtel has designated the following individual as the person responsible for oversight of this Plan and as the point of contact for robocall mitigation matters, including inquiries from the Commission, law enforcement, and the Industry Traceback Group (“ITG”):

Name	Steve Rojas Villaplana
Title	Chief Executive Officer

Company	Maxtel LLC
Business Address	380 Bleecker Street #2, New York, NY 10014
Telephone	909-488-5465
Email	compliance@maxtel.cc

5. Robocall Mitigation Measures

Maxtel has implemented the following measures as the specific, reasonable steps it takes to avoid originating, carrying, or processing illegal robocall traffic on its network.

5.1 Customer Onboarding and Know-Your-Customer Screening

Before activating service, provisioning network connectivity, or assigning telephone number resources to a new or renewing customer, Maxtel collects information sufficient to confirm the customer's identity and the legitimacy of its business, including the customer's legal name, place of incorporation or formation, physical business address, billing contact, and a description of the intended use of the service. Where the prospective customer is itself a Voice Service Provider, Foreign Voice Service Provider, Intermediate Provider, or Gateway Provider, Maxtel confirms the customer's current status in the RMD (see Section 5.3) before accepting its traffic.

5.2 Contractual Prohibitions on Unlawful Traffic

Maxtel's customer agreements prohibit the use of its services to originate or transmit calls that violate the Telephone Consumer Protection Act, the TRACED Act, or any implementing FCC rule. Maxtel's agreements reserve its right to suspend or terminate service immediately, without advance notice, upon evidence that a customer's traffic violates these prohibitions, in addition to any other remedy available to Maxtel.

5.3 Upstream Provider Vetting — RMD-Listed Providers Only

Maxtel accepts voice traffic directly from another Voice Service Provider, Foreign Voice Service Provider, Foreign Intermediate Provider, or Gateway Provider only where that provider's certification currently appears in the RMD and has not been removed as a result of an FCC enforcement action. (47 C.F.R. § 64.6305(e)(1)–(3).)

5.4 Do-Not-Originate List Enforcement

Maxtel blocks calls that purport to originate from telephone numbers included on a reasonable, industry-recognized Do-Not-Originate ("DNO") list. Maxtel reviews and updates the DNO numbers it screens against on an ongoing basis and blocks matching traffic before it is delivered downstream. (47 C.F.R. § 64.1200(k)(2), (o)(1)–(4).)

5.5 Network Traffic Monitoring and Anomaly Detection

Maxtel continuously monitors call traffic that originates on, terminates to, or transits its network, looking for patterns associated with illegal robocalling — for example, abnormally high call volumes, unusually short call durations, atypical calling patterns from a single source, or spikes inconsistent with a customer's known traffic

profile. When Maxtel's monitoring identifies traffic consistent with illegal robocalling, Maxtel investigates and takes appropriate action, which may include contacting the originating customer, blocking the traffic in question, or suspending or terminating the customer's service.

5.6 Gateway Safeguards for Foreign-Originated Traffic

When acting as a Gateway Provider, Maxtel applies the monitoring practices described in Section 5.5 to confirm that upstream Foreign Voice Service Providers and Foreign Intermediate Providers are not using Maxtel's network to deliver a high volume of illegal traffic into the United States. Maxtel also blocks, to the extent technically practicable, foreign-originated calls that display a U.S. North American Numbering Plan number in the caller ID field, unless the sending provider has previously been vetted and approved to send such traffic. *(47 C.F.R. § 64.1200(n)(4).)*

5.7 Caller ID Authentication by Network Role

As a Voice Service Provider, Maxtel authenticates and, where applicable, verifies caller identification information for all calls it originates and exchanges with other providers, consistent with 47 C.F.R. § 64.6301(a), across its entire network as described in Section 3.

As an Intermediate Provider, Maxtel passes authenticated caller identification information through unaltered. For calls it receives that are not authenticated, Maxtel relies on its cooperative participation in the industry traceback consortium and its record of timely response to traceback requests, consistent with 47 C.F.R. § 64.6302(b)–(c).

As a Gateway Provider, Maxtel works toward authenticating caller identification information for unauthenticated calls it receives that use U.S. North American Numbering Plan resources and that it exchanges with another provider as a SIP call, consistent with 47 C.F.R. § 64.6302(b).

5.8 Cooperation with Traceback Requests

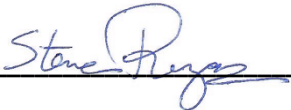
Maxtel responds to traceback requests from the Commission, law enforcement, and the Industry Traceback Group within twenty-four (24) hours of receipt, and cooperates fully with these entities in identifying and stopping illegal robocallers who attempt to use Maxtel's network. As a Gateway Provider, Maxtel is subject to, and commits to meet, the twenty-four (24) hour traceback response timeframe required by 47 C.F.R. § 64.1200(n)(1)(ii). Where Maxtel receives written notice from the Commission's Enforcement Bureau identifying specific illegal traffic, Maxtel takes the steps necessary to mitigate that traffic consistent with the notice and applicable FCC rules, and in any event within the timeframe specified in that notice. *(47 C.F.R. § 64.1200(n)(1)–(3), (5).)*

6. Plan Maintenance and RMD Updates

Maxtel will update its RMD filing, including this Plan, within ten (10) business days of any change to the information required to be reported in the RMD. *(47 C.F.R. § 64.6305(c)(5), (d)(5).)* Maxtel reviews this Plan at least annually and in connection with the RMD's annual recertification requirement to confirm that it continues to accurately describe Maxtel's practices.

7. Certification

Maxtel LLC certifies that the practices described in this Plan are currently in effect and that the individual identified in Section 4 is authorized to respond on Maxtel's behalf to Commission, law enforcement, and industry traceback inquiries regarding this Plan.

Signature: _____

Name / Title: Steve Rojas Villaplana
Chief Executive Officer

Date: August 19, 2026