

Robocall Mitigation Program Description

Filed in accordance with 47 CFR § 64.6305 and the FCC Robocall Mitigation Database Filing Instructions

1. Filer Information

Legal Business Name: GLM Telecom srl

FCC Registration Number (FRN): 0038264479

Business Address: Via Vincenzo Monti 2, 20123, Lombardia, Milano, Italy

Provider Classification: Non-Gateway Intermediate Provider. The filer does not originate voice calls on the public switched telephone network. The filer provides wholesale call transport/routing services between other voice service providers, gateway providers, and/or intermediate providers, and its role in the call path is limited to carrying and processing calls that are originated by other entities.

Foreign Voice Service Provider: Yes — Country for Business Address: Italy

2. Robocall Mitigation Point of Contact

Primary Contact (Network Operations Center):

Name: Agent On Duty

Title: Network Operations Center (NOC)

Telephone: +39 0249535012 / +39 0287367093

Fax: +39 0249535014

Email: noc@glmtelecom.com

Second-Level Escalation Contact:

Name: Giorgia Andrei

Title: Traffic Manager

Telephone: +40731744107

Email: andrei.giorgia@glmtelecom.com

3. Description of Robocall Mitigation Program

As a non-gateway intermediate provider, GLM Telecom srl does not originate calls onto the public switched telephone network. GLM Telecom srl carries and processes voice traffic on a wholesale basis between upstream and downstream voice service providers, gateway providers, and/or other intermediate providers. GLM Telecom srl has implemented the following reasonable steps to avoid carrying or processing illegal robocall traffic:

- **Customer Vetting / Know-Your-Customer (KYC):** GLM Telecom srl screens customers prior to onboarding. As part of this screening process, the company requires its upstream customers to certify their own compliance with applicable robocalling and call-authentication obligations before traffic is accepted.
- **Contractual Obligations:** GLM Telecom srl's customer contracts include a termination clause permitting the company to suspend or terminate service to any customer found to be originating or transmitting fraudulent or illegal traffic.
- **Traffic Monitoring and Call Analytics:** GLM Telecom srl employs filters to detect repeated call attempts originating from the same source and monitors SIP status codes across its network. When abnormal patterns or irregular SIP response behavior are identified, the company investigates the traffic in question.
- **STIR/SHAKEN Attestation Handling:** [PLACEHOLDER — replace before filing] — e.g., describe whether you pass through STIR/SHAKEN authentication information unaltered, and any steps taken to preserve call authentication data through your network.
- **Traceback Cooperation:** Upon receipt of a traceback request, GLM Telecom srl's Network Operations Center (NOC) first issues a standard acknowledgment response and immediately initiates an internal escalation to begin investigating the complaint. GLM Telecom srl commits to responding fully and within 24 hours with a proposed resolution to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (currently the USTelecom Industry Traceback Group), and to cooperating with such entities in investigating and stopping illegal robocallers that use its service to carry or process calls.
- **Remediation:** Following investigation of a traceback request or internally flagged abnormality, GLM Telecom srl escalates concerns with the originating or upstream provider as warranted and, consistent with its contractual termination rights, suspends or terminates traffic associated with confirmed bad actors.

4. Certifications

GLM Telecom srl certifies that it has not had a prior certification removed by Commission action and has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

GLM Telecom srl certifies that the robocall mitigation program described above is consistent with the requirements of 47 CFR § 64.6305(a), and that all statements made in this filing are true, accurate, and complete to the best of the undersigned's knowledge, information, and belief.

5. Authorized Signature

Name: Marco D'Aurelio

Title: CEO & President

Date: 26/08/2026

Signature: Marco D'Aurelio

NOTE TO PREPARER: This is a template only. All bracketed placeholders and text marked "[PLACEHOLDER — replace before filing]" must be reviewed, completed with accurate, company-specific information, and verified before this document is submitted to the FCC Robocall Mitigation Database. Submitting inaccurate certifications to the FCC may result in enforcement action. Consider having counsel or a compliance officer review the final version before filing.