



CHOCK telecom

Robocall Mitigation Plan

October 2026

1 Purpose and Scope

This Plan describes the reasonable steps ChockTelecom takes to prevent illegal robocall traffic from originating on its network, as required by 47 C.F.R. § 64.6305(a), and supports the Company's certification in the FCC Robocall Mitigation Database ("RMD") under 47 C.F.R. § 64.6305(d).

The Plan establishes ChockTelecom's procedures for customer due diligence, caller ID authentication, traffic monitoring, traceback response, and the investigation and mitigation of suspected illegal traffic.

2 Company Profile and Role in the Call Path

ChockTelecom Corp. is a Florida corporation headquartered in North Miami, Florida. The Company provides wholesale voice services to business and wholesale customers.

ChockTelecom operates as a voice service provider that originates calls on behalf of its direct business and wholesale customers. The Company applies the robocall mitigation measures described in this Plan to all calls it originates and will ensure that its RMD certification accurately reflects its role, services, and actual call flows.

Company and Registration Profile

Legal name	ChockTelecom Corp.
Entity type	Florida profit corporation
Federal EIN	41-2547722
Principal office	2201 Sole Mia Square Lane, North Miami, FL 33181
President and Director	Alejandro Mario Garcia Molinares
Email	compliance@chocktelecom.com
Website	https://www.chocktelecom.com/

3 Caller ID Authentication (STIR/SHAKEN)

ChockTelecom is implementing the STIR/SHAKEN caller ID authentication framework in the IP portions of its network, consistent with 47 C.F.R. § 64.6301. The Company is completing onboarding with the STIR/SHAKEN Policy Administrator (iconectiv) and will obtain its own SPC token and certificate from an approved Certificate Authority following issuance of its Operating Company Number.

Once operational, ChockTelecom will:

- Sign all SIP calls it originates using its own SPC token and certificate.
- Assign attestation levels that accurately reflect its relationship with the customer and the customer's right to use the calling number.

- Pass unaltered any Identity header received on traffic it carries.

Until authentication is fully implemented, the customer due diligence, provider vetting, monitoring and traceback measures in this Plan constitute ChockTelecom's robocall mitigation program, and the Company's RMD certification will reflect its implementation status accurately. ChockTelecom will update its RMD filing within 10 business days of completing implementation.

4 Know Your Customer

ChockTelecom takes affirmative, effective measures to prevent new and renewing customers from using its network to originate or transmit illegal robocalls, consistent with 47 C.F.R. § 64.1200(n). No customer is activated until due diligence is complete and approved.

The review covers:

- Identity and ownership: Verification of the customer's legal name, formation and good-standing records, business address, tax identification, authorized representatives, principals and beneficial owners.
- Regulatory standing: Where applicable, verification of the customer's FCC Registration Number, Form 499 Filer ID, Robocall Mitigation Database registration and provider role. ChockTelecom also reviews relevant FCC enforcement actions and traceback requests.
- Intended use and traffic profile: Review of the customer's proposed services, sources and purposes of calls, expected call volumes and calls-per-second, geographic destinations, calling campaigns and use of prerecorded or artificial-voice technology

ChockTelecom applies additional review when customer information, proposed services or traffic patterns indicate a higher level of risk. If material concerns cannot be resolved, ChockTelecom may decline to provide service or take appropriate action, including restricting, suspending or terminating the customer's service.

Where ChockTelecom receives traffic directly from another voice service provider or intermediate provider, it verifies before interconnection that the provider has an active Robocall Mitigation Database filing, as required by 47 C.F.R. § 64.6305(g).

Customers and directly connected providers are reviewed periodically and whenever a material risk trigger occurs. ChockTelecom maintains records of the information reviewed, supporting documentation, approval decision, risk classification, service restrictions and subsequent reviews for compliance and risk-management purposes.

5 Traffic Monitoring and Call Blocking

ChockTelecom uses the Mera 5.0 Switch platform's network controls and traffic analytics to monitor calls it originates or transmits for patterns that may indicate illegal or unauthorized calling. Operations personnel review alerts and investigate suspicious traffic patterns. These controls include:

- Per-customer call-volume and calls-per-second limits set at activation according to the approved use case.

- Reasonable analytics on answer-seizure ratio, average call duration, short-duration calls, invalid or unassigned calling numbers and calling-number rotation.
- Blocking of calls that purport to originate from numbers on a reasonable Do-Not-Originate list.
- Immediate notification using SIP response code 603+ when a call is blocked on the basis of analytics, as required by 47 C.F.R. § 64.1200(k)(9).

When ChockTelecom identifies traffic that may contain illegal robocalls, it promptly investigates the available information and seeks to identify the responsible customer. Based on the results, ChockTelecom may block affected calls, reduce traffic limits, suspend service, or terminate the customer relationship.

Calls to 911 are never blocked, and ChockTelecom makes all reasonable efforts to ensure that calls from public safety answering points and government emergency numbers are not blocked.

6 Traceback and Commission Notices

ChockTelecom responds fully and in a timely manner, and in any event within 24 hours, to traceback requests from the Commission, law enforcement and the registered industry traceback consortium, consistent with 47 C.F.R. §§ 64.6305(a) and 64.1200(n). Requests are received at a monitored compliance mailbox and handled by the designated contact below.

On receipt of a Notice of Suspected Illegal Traffic from the Enforcement Bureau, ChockTelecom promptly investigates the identified traffic, blocks it where required, takes steps to prevent the customer responsible from continuing to originate it, and reports the outcome to the Commission within the time the notice requires.

Designated contact	Alejandro Mario Garcia Molinares, President and Director
Compliance mailbox	compliance@chocktelecom.com
Telephone	+57 350 600 0400

7 Contractual Controls and Caller ID Integrity

Every customer signs a Master Services Agreement and accepts ChockTelecom's Acceptable Use Policy before activation. Together they require customers to:

- Comply with the Telephone Consumer Protection Act, the Truth in Caller ID Act (47 U.S.C. § 227(e)), the Telemarketing Sales Rule and applicable state law.
- Not use ChockTelecom's services to originate or transmit illegal robocalls. Upon notification of suspected illegal traffic, promptly investigate, provide the requested information, and take corrective action, including stopping the identified traffic where warranted.
- Use only calling numbers assigned to them or otherwise authorized for their use, and do not alter or falsify caller ID information.
- Cooperate fully and promptly with traceback requests and compliance inquiries.
- Notify ChockTelecom of any material change in ownership, business model or calling activity.

ChockTelecom may suspend, restrict or terminate service immediately, and without prior notice, where it reasonably determines that a customer has violated these terms, that traffic is likely unlawful, or that action is required to meet a legal or regulatory obligation.

8 RMD Maintenance and Recertification

ChockTelecom reviews its RMD filing and updates it within 10 business days of any change to the required information. The Company also completes the annual recertification required by 47 C.F.R. § 64.6305(h) on or before March 1 and will comply with any applicable RMD filing-fee requirements once implemented by the FCC.