

ROBOCALL MITIGATION PLAN

AWANTEL LLC

Company Information

Item	Details
Company Name	AVA BARLIN EXPRESS GMBH
FRN	0038947669
FCC Form 499 Filer ID	839335
Principal Operating Address	Gutenbergstraße 61, 14467 Potsdam, Germany
Website	www.avagrp.ai
Owner / Compliance Contact	Adnan Zadran
Email	support@avagrp.ai

1. STIR/SHAKEN Implementation Status

AVA BARLIN EXPRESS GMBH is currently in the process of implementing STIR/SHAKEN and is actively working with industry partners and service providers to complete deployment in accordance with applicable FCC requirements.

The company expects STIR/SHAKEN implementation to be completed as part of its ongoing network compliance and authentication framework. Until implementation is fully completed, AVA BARLIN EXPRESS GMBH relies on robust robocall mitigation procedures, customer verification processes, traffic monitoring, traceback cooperation, and other compliance measures described in this plan to prevent the origination and transmission of illegal robocalls.

AVA BARLIN EXPRESS GMBH will maintain compliance with all applicable FCC robocall mitigation obligations and will update its policies and procedures as STIR/SHAKEN deployment progresses.

2. Business Model & Network Role

AVA BARLIN EXPRESS GMBH participates in the telecommunications ecosystem in two primary capacities:

Wholesale Services

Providing voice termination and interconnection services to:

- Carrier partners
- Resellers
- Telecommunications providers

Direct Customer Services

Providing telecommunications services directly to retail and business customers originating traffic through the company's network and platform.

Estimated Traffic Distribution

Traffic Type	Percentage
Direct End-User Traffic	25%
Wholesale & Reseller Traffic	75%

3. Robocall Mitigation Program

AVA BARLIN EXPRESS GMBH takes affirmative and effective measures to prevent its network from being used to originate illegal robocalls.

3.1 Know Your Customer (KYC) Procedures

- Identity verification of all customers prior to service activation.
- Collection of valid government identification.
- Collection of business registration records.
- Collection of tax identification documentation.
- Verification of authorized representatives.
- Risk-based customer onboarding and screening.
- Enhanced due diligence for high-risk industries including:
 - Debt recovery
 - Lead generation
 - Healthcare communications
 - Political outreach

3.2 Traffic Monitoring & Analytics

AVA BARLIN EXPRESS GMBH continuously monitors inbound and outbound traffic using automated and manual review processes.

Monitoring includes:

- High-volume traffic spikes
- Short-duration call activity
- Sequential dialing patterns
- Auto-dialing behavior
- Completion-rate anomalies
- Other suspicious traffic indicators

Automated alerts are generated whenever unusual activity is detected.

3.3 Call Blocking & Filtering

The company utilizes automated fraud detection and filtering systems to:

- Block suspicious traffic;

- Prevent spoofed calling activity;
- Restrict calls with suspicious caller ID information; and
- Act upon STIR/SHAKEN verification warnings.

Traffic may be blocked, rejected, isolated, or investigated when warranted.

3.4 Do-Not-Originate (DNO) Protection

AVA BARLIN EXPRESS GMBH maintains protections against caller ID spoofing and invalid number usage through:

- Industry-standard Do-Not-Originate (DNO) lists;
- Internal risk databases; and
- Blocking of invalid, unallocated, or spoofed telephone numbers.

3.5 Traceback Cooperation

AVA BARLIN EXPRESS GMBH fully cooperates with traceback efforts and industry partners, including the U.S. Telecom Industry Traceback Group.

Traceback Procedures

- Responses to traceback requests within 24 hours or within the applicable regulatory timeframe.
- Investigation of the traffic source and associated customer account.
- Retention of traceback records for a minimum of two (2) years.

3.6 Upstream Provider Compliance

AVA BARLIN EXPRESS GMBH works only with reputable and compliant upstream providers. Preference is given to carriers that:

- Have implemented STIR/SHAKEN; and
- Maintain strong robocall mitigation and compliance programs.

3.7 Downstream Customer Enforcement & TCPA Controls

All customers must comply with:

- Telephone Consumer Protection Act (TCPA)
- Telemarketing Sales Rule (TSR)
- Federal and State Do-Not-Call requirements
- Company Terms of Service
- Acceptable Use Policy

Additional controls include:

- Consent documentation requirements for outbound campaigns when applicable.
- Continuous monitoring of customer traffic.
- Immediate investigation of suspicious activity.
- Immediate suspension or permanent termination for policy violations.

3.8 Record Retention

AVA BARLIN EXPRESS GMBH maintains:

- Call Detail Records (CDRs)
- Traffic monitoring logs
- Customer compliance records

Records are retained for a minimum of two (2) years and are available for regulatory or traceback purposes upon request.

3.9 Regulatory Compliance

AVA BARLIN EXPRESS GMBH complies with all applicable regulations related to robocall mitigation, including:

- FCC Robocall Mitigation Requirements
- Telephone Consumer Protection Act (TCPA)
- Telemarketing Sales Rule (TSR)
- Federal and State Do-Not-Call Requirements
- Applicable STIR/SHAKEN Obligations

4. Network Security & Traffic Controls

To maintain network integrity and minimize abuse, AVA BARLIN EXPRESS GMBH employs multiple monitoring, fraud detection, and enforcement mechanisms.

Where policy violations are identified:

- Services may be suspended immediately;
- Traffic may be blocked or restricted; and
- Accounts may be permanently terminated depending on the severity of the violation.

5. Management & Public Presence

AVA BARLIN EXPRESS GMBH is a privately owned telecommunications company.

Adnan Zadran serves as the Owner and primary point of contact for:

- Compliance
- Operations
- Carrier Relations
- Regulatory Matters

Management remains directly accessible and actively involved in day-to-day operations and compliance oversight.

The company continues to expand its public business presence and professional profiles across relevant industry platforms. Government-issued identification of the owner has been provided where required to support carrier due diligence and compliance reviews.

Submitted By

Adnan Zadran

Owner, AVA BARLIN EXPRESS GMBH

Email: Adnan@avagrp.ai

Website: www.avagrp.ai