

TRAVO MOBILE LLC

ROBOCALL MITIGATION PLAN

Complete the contact fields and verify that the procedures and PWG support described below are in place before submission.

BUSINESS INFORMATION	Travo Mobile LLC Texas limited liability company
Business address	5900 BALCONES DR STE 32973 AUSTIN, TX 78731
CONTACT INFORMATION	Danish Memon Managing Member
Business email / phone	Email: Danish@travomobile.com Phone: 832-282-0045
SERVICE ARRANGEMENT	Wholesale provider: PWG (Prepaid Wireless Wholesale, LLC) Underlying wireless network: T-Mobile only

OVERVIEW AND PURPOSE

Travo Mobile LLC (Travo) intends to provide U.S. wireless SIM/eSIM voice services as a non-facilities-based reseller/MVNO through PWG using the T-Mobile network exclusively. This plan addresses prevention of illegal robocalls, customer due diligence, upstream coordination, investigation and traceback cooperation. Supported Wi-Fi Calling is included in this service model.

STIR/SHAKEN IMPLEMENTATION STATUS

Travo has selected No STIR/SHAKEN Implementation. Under the described reseller arrangement, Travo does not own, operate or control the switching, SIP signaling or authentication infrastructure needed to implement STIR/SHAKEN. That infrastructure remains with PWG and/or T-Mobile. Travo relies on the lack-of-network-control basis explained in FCC 20-136, paragraphs 19-20, and recognized in 47 CFR 64.6305(d)(2)(i). Travo retains its own mitigation and filing obligations.

KNOW YOUR CUSTOMER

Before activation, Travo will collect the customer name, email and service/billing address, verify a contact channel and review account details, associate each number and SIM/eSIM with its customer, and review suspicious orders or inconsistencies. Multiple linked accounts, unusual SIM quantities, payment concerns, complaints or abnormal usage will trigger additional checks. New and renewing customers presenting unresolved abuse concerns will be declined or restricted. Review decisions will be recorded.

ACCEPTABLE USE POLICY

Customers will accept terms prohibiting illegal robocalling, fraud, unlawful caller-ID spoofing and circumvention of abuse controls. The terms will authorize investigation and appropriate restriction, suspension or termination. Travo will retain acceptance records and apply these protections to renewals and additional lines. The final filed plan must accurately reflect the customer terms actually adopted.

UPSTREAM PROVIDER

PWG is Travo's wholesale provider; T-Mobile is the sole underlying network. Travo will verify relevant provider identities and RMD entries, retain PWG abuse/traceback contacts, and establish written arrangements for call-record access, urgent investigation and service restriction. Travo will describe applicable cooperation and anti-abuse terms in its actual PWG agreement and review the arrangement when material changes occur.

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ROBOCALL MITIGATION PLAN | CONTINUED

ANALYTICS FOR MONITORING TRAFFIC

Travo's proposed review process uses customer-account records, complaints and usage reports or alerts available through PWG. Indicators for review include sudden calling spikes, repeated short calls, unusually many destinations, sequential dialing and activity across linked accounts. Travo will coordinate with PWG on carrier-level analytics and blocking. The final filing must identify the actual systems used and any third-party analytics vendors; no proprietary fraud-scoring system or real-time monitoring capability is claimed by this draft.

INVESTIGATING SUSPICIOUS ACTIVITY

Travo will log alerts and complaints, identify the affected customer and number, review available evidence and escalate network issues to PWG. Where warranted, Travo will request or apply available restrictions, verify the action, and suspend or terminate confirmed abusive service under its terms. Records will show the reason, response time and outcome. Related accounts will be reviewed, and mistaken restrictions will be investigated and corrected.

BLOCKING AND TRACEBACK COOPERATION

Travo will coordinate applicable Do-Not-Originate and illegal-traffic blocking measures with PWG while protecting emergency calling. The responsible officer or backup will respond fully to traceback requests from the FCC, civil or criminal law enforcement, and the industry traceback consortium within the applicable 24-hour deadline under 47 CFR 64.1200(n)(1).

Travo will verify and log each request, correlate the call's numbers and timestamp/time zone to customer records, obtain necessary network information from PWG, provide an accurate response and document corrective action. A referral to PWG alone will not be treated as a completed response. Travo will agree an escalation process that permits timely responses and cooperate in stopping illegal callers.

RECORDS AND PLAN UPDATES

Customer checks, terms acceptance, provider checks, complaints, traceback responses and corrective actions will be retained securely under an appropriate retention schedule. Authorized staff will receive an escalation guide. Travo will review this program after material changes, update required RMD information within ten business days, and complete annual recertification by March 1 as applicable.

OFFICER REVIEW AND CERTIFICATION

I, Danish Memon, Managing Member of Travo Mobile LLC do hereby certify, under penalty of perjury, the following:

1. Travo Mobile LLC is not required to implement STIR/SHAKEN, due to its lack of control over the necessary infrastructure.
2. Travo Mobile LLC business name and primary address are as follows: 5900 BALCONES DR STE 32973 AUSTIN, TX 78731
3. Travo Mobile LLC has no other business name.
4. Travo Mobile LLC has not previously used any other business name.
5. The following persons own more than 10% of Travo Mobile: Danish Memon
6. Travo Mobile LLC's role in the call chain is that of a reseller/voice service provider with no STIR/SHAKEN implementation obligation.
7. Travo Mobile LLC is not prohibited from filing in the Robocall Mitigation Database due to an

enforcement action.

8. Travo Mobile LLC has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

9. Travo Mobile LLC is not required to and does not have an Operator Code Number.