

Robocall Mitigation Program



Filer / Legal Entity Name	NETERA PTY LTD
FCC Registration Number (FRN)	0039032040
Jurisdiction of Organization	Australia
Date	October 19, 2026

Introduction and Scope

This Robocall Mitigation Program Description is submitted by NETERA PTY LTD pursuant to 47 CFR § 64.6305.

NETERA PTY LTD is a telecommunications voice service provider organized and operating under the laws of Australia. NETERA PTY LTD provides wholesale voice transit, SIP trunking, and telecommunications services to wholesale and business enterprise clients. NETERA PTY LTD originates and routes voice traffic originating outside the United States and hands off U.S.-bound traffic to upstream intermediate and gateway carriers (including DIDWW).

Because NETERA PTY LTD is an overseas provider operating without direct access to U.S. Service Provider Code (SPC) tokens administered by the Secure Telephone Identity Governance Authority (STI-GA), NETERA PTY LTD has certified under Option 3 (No STIR/SHAKEN Implementation) and enforces this comprehensive Robocall Mitigation Program across all outbound traffic destined for the United States.

Know-Your-Customer (KYC) and Onboarding Procedures

To prevent bad actors from accessing the public switched telephone network (PSTN) and originating illegal robocall traffic, NETERA PTY LTD enforces rigorous Know-Your-Customer policies before provisioning services:

- Identity and Entity Verification:** All prospective wholesale clients, Managed Service Providers (MSPs), and direct customers must provide verifiable business registration details, corporate identity documentation, registered physical office addresses, primary technical and operational contacts, and verifiable billing arrangements.
- Intended Use Case Review:** Every prospective customer must complete a voice profiling questionnaire detailing their intended use case, principal business activities, anticipated traffic profiles, expected call volumes, Average Call Duration (ACD), Answer-Seizure Ratio (ASR), and peak Calls Per Second (CPS).



- **Prohibition of High-Risk / Deceptive Traffic:** NETERA PTY LTD's Terms of Service and Acceptable Use Policy (AUP) explicitly prohibit the transmission of illegal autodialed telemarketing, unlawful robocalls, spoofed caller identification, deceptive financial phishing, or nuisance traffic. Any customer intending to operate high-volume automated dialling or non-conversational call traffic is subjected to enhanced scrutiny or prohibited from outbound trunk access.

Caller ID (CLI) Validation and Anti-Spoofing Controls

NETERA PTY LTD maintains technical and policy safeguards to prevent unauthorized caller ID spoofing:

- **Number Legitimacy:** Customers routing outbound traffic through NETERA PTY LTD are permitted to present only:
 1. Telephone numbers directly assigned, ported, or leased to them by NETERA PTY LTD or authorized upstream carriers; or
 2. Third-party numbers where the customer has demonstrated verified right-of-use and legitimate legal authority to present that Calling Party Number (CPN).
- **Format Standardization:** All outbound signalling must conform to valid E.164 formatting conventions. NETERA PTY LTD's session border controllers and routing proxies drop, sanitize, or reject invalid, malformed, non-dialable, or unassigned Calling Line Identification (CLI) prefixes before traffic leaves the network.

Traffic Analytics and Anomaly Monitoring

NETERA PTY LTD actively monitors network traffic patterns to detect and mitigate fraudulent or abusive calling behaviour:

- **Statistical Anomaly Detection:** Outbound call streams are monitored for key indicators of abusive or illegal robocalling, including:
 - High call completion failures or abnormally low Answer-Seizure Ratios (ASR < 20%);
 - Exceptionally short Average Call Duration (ACD < 15 seconds) combined with burst volumes;
 - Rapid sequential dialling or sudden, uncharacteristic spikes in Calls Per Second (CPS).
- **Investigation and Immediate Suspension:** Upon identifying anomalous traffic patterns suggestive of unlawful robocalls or complaints from upstream transit providers, NETERA PTY LTD reserves the contractual and technical authority to immediately suspend trunking routes, block specific CLIs, or terminate services to offending accounts pending investigation.

Commitment to 24-Hour Traceback Cooperation

Pursuant to 47 CFR § 64.6305, NETERA PTY LTD commits to full and timely cooperation with industry traceback inquiries:



- **Designated Traceback Contact:** NETERA PTY LTD maintains a designated 24/7 operational contact point for lawful traceback inquiries.
- **Rapid Response Window:** NETERA PTY LTD commits to responding fully and substantively within **twenty-four (24) hours** to all traceback requests received from the Federal Communications Commission (FCC), law enforcement authorities, and the official Industry Traceback Group (ITG / USTelecom).
- **Upstream Investigation:** NETERA PTY LTD maintains comprehensive call detail records (CDRs) and SIP signalling logs enabling prompt identification of the downstream ingress point, customer account ID, source IP address, and authorization details for any flagged call session.

Certifying Official

I hereby certify under penalty of perjury that I am an authorized officer of NETERA PTY LTD, that I have examined this Robocall Mitigation Program Description, and that the information, policies, and practices described herein are true, correct, and actively enforced by the company.

Signature: _____

Name: Jacob Talbot

Title: Managing Director

Company: NETERA PTY LTD

Email: jacob.talbot@netera.com.au

Phone: +61 488 159 343

Address: 1/86 Mann Street, Gosford, NSW Australia 2250

