Robocall Mitigation Program Description

Filing Entity: TelSmart NV

FCC Registration Number (FRN): 0039225594

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1. Company Overview

TelSmart NV is a Belgian telecommunications company operating as a licensed VoIP provider and Mobile Virtual Network Operator (MVNO) under Belgian and European Union telecommunications regulations. TelSmart provides voice, data, and mobile services primarily to verified business customers (SMEs) in Belgium and the European Union. TelSmart is regulated by the Belgian Institute for Postal Services and Telecommunications (BIPT).

2. Nature of US-Bound Traffic

TelSmart originates a limited volume of voice calls to US destinations on behalf of its verified business customers. These calls are legitimate business communications (e.g., calls to US-based suppliers, partners, or clients). TelSmart does not originate, facilitate, or knowingly transmit mass automated calls, robocalls, or spoofed calls to US destinations. US-bound traffic is routed through DIDWW, a licensed international carrier.

3. STIR/SHAKEN Implementation Status

As a foreign voice service provider without a direct connection to the US telephone network, TelSmart does not currently implement STIR/SHAKEN call authentication. TelSmart relies on its downstream US-based gateway provider (DIDWW) to apply STIR/SHAKEN authentication to calls entering the US network, in accordance with FCC requirements for gateway providers.

4. Robocall Mitigation Practices

TelSmart has implemented the following measures to prevent illegal robocall traffic:

a) Know Your Customer (KYC): All TelSmart customers are contractually identified business entities. TelSmart verifies the identity, business registration, and legitimacy of each customer before provisioning voice services. Consumer or anonymous accounts are not offered.

b) Traffic Monitoring: TelSmart monitors outbound call traffic patterns for anomalies that may indicate illegal robocalling activity, including unusual call volumes, short-duration calls to large numbers of unique destinations, and other suspicious patterns.

c) Contractual Obligations: TelSmart's terms of service explicitly prohibit the use of its network for illegal robocalling, caller ID spoofing, or any activity that violates applicable telecommunications regulations, including US FCC rules.

d) Enforcement and Blocking: Upon detection or notification of suspected illegal robocall activity, TelSmart will promptly investigate and, where warranted, suspend or terminate the offending customer's service and block further traffic from that source.

e) Traceback Cooperation: TelSmart will cooperate fully with US authorities, the Industry Traceback Group

(ITG), and downstream providers in any traceback investigations related to calls originating from its network.

5. Commitment

TelSmart NV is committed to preventing illegal robocall traffic from originating on its network and will continue to refine its mitigation practices as technology and regulatory requirements evolve. TelSmart will update this filing as required by FCC regulations.