FORTUNE 500 · TELECOMMUNICATIONS

USE CASE · FOCI & PADFA COMPLIANCE

# #3 U.S. Telecom

*Eight hundred critical infrastructure vendors screened for foreign ownership in 90 days, under a regulatory deadline.*

**~800**

**CRITICAL INFRASTRUCTURE VENDORS**

Screened for FOCI under FCC regulatory deadline

**500M+**

**COMPANIES IN OWNERSHIP GRAPH**

Multi-jurisdictional ownership tracing

**Continuous**

**MONITORING**

Ongoing surveillance for ownership changes

01 AT A GLANCE

CHALLENGE

### Two regulations converged with no automated screening capability

FCC rip-and-replace mandates and PADFA created an immediate, high-volume screening requirement. The carrier had only manual research and self-attestation - methods that could not deliver the volume, speed, or depth required.

SOLUTION

### Ownership-chain analysis across 500M+ companies

The carrier deployed an investigative platform giving analysts direct access to ownership chain analysis, beneficial ownership resolution, and foreign government connection identification.

RESULT

### Eight hundred vendors screened, continuous FOCI monitoring deployed

The TPRM team completed the FCC compliance screen and generated documentation; the legal team established a repeatable PADFA evaluation process for every new data-sharing relationship.

02 THE CHALLENGE

# Your vendors passed sanctions screening. Their owners were not checked.

**One of the top three U.S. telecommunications carriers faced a dual compliance challenge. The TPRM team needed to screen approximately 800 critical infrastructure vendors for FOCI exposure as part of the FCC rip-and-replace mandate. Simultaneously, the legal and compliance team needed to evaluate data-sharing partners under PADFA to identify any foreign adversary connections in their vendor ecosystem.**

**There was no automated screening capability in place. The carrier's existing vendor management processes relied on manual research and self-attestation - methods that could not deliver the volume, speed, or depth required by the new regulations. Screening 800 vendors for ownership chains, beneficial ownership connections, and foreign government ties required a fundamentally different approach.**

KEY POINTS

- FCC rip-and-replace mandate + PADFA created an immediate dual compliance requirement
- No automated screening capability - only manual research and self-attestation
- ~800 critical infrastructure vendors needed FOCI exposure assessment
- Self-attestation cannot reveal foreign government ties hidden in ownership chains

# PADFA-specific FOCI screening with primary-source registry evidence

**The carrier deployed an investigative platform for FOCI screening, giving analysts direct access to ownership chain analysis, beneficial ownership resolution, and foreign government connection identification across 500M+ companies. The platform's graph architecture allowed the team to trace vendor ownership structures through multiple jurisdictions and identify connections to foreign adversary entities that self-attestation questionnaires would never reveal.**

**For the PADFA use case, the legal team used the same platform to evaluate data-sharing partners, screening for foreign adversary ownership and control indicators that would trigger restrictions under the new law.**

KEY POINTS

- Direct ownership chain analysis across 500M+ companies in 250+ jurisdictions
- Graph traces vendor ownership through multiple jurisdictions to foreign adversary entities
- Same platform serves both FOCI (TPRM team) and PADFA (legal team) use cases

SAYARI CAPABILITIES USED

Sayari Graph | Beneficial Ownership Tracing | FOCI Screening | PADFA Compliance | Continuous Monitoring | Ownership Chain Analysis

04 THE RESULTS

# FOCI screening embedded in vendor qualification - continuously

**The carrier now operates with continuous FOCI monitoring across its critical infrastructure vendor base. The compliance team that scrambled to screen 800 vendors under regulatory deadline pressure now runs ongoing surveillance that catches ownership changes, new sanctions designations, and emerging FOCI indicators as they occur. The PADFA compliance framework built during the initial evaluation serves as a repeatable process for every new data-sharing relationship.**

| ~800 | 250+ | Continuous |
|---|---|---|
| Critical infrastructure vendors screened for FOCI | Jurisdictions for ownership chain tracing | Surveillance flags ownership changes and emerging FOCI indicators |

> *"We can now independently verify vendor ownership claims against authoritative source data, rather than relying on vendor self-reporting."*
>
> HEAD OF TPRM, #3 U.S. TELECOM

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