

TCN is a global provider of a comprehensive, cloud-based (SaaS) contact center platform for enterprises, contact centers, business process outsourcing firms, and collection agencies. TCN's contact center SaaS platform, Operator, features a holistic set of easy-to-use, automated agent tools and advanced apps for omnichannel communications, workforce engagement, compliance and data management, integration and automation, intelligence, reporting and analytics, and collaboration and accessibility.

In addition to a complete implementation of STIR/SHAKEN, TCN has implemented the following Robocall Mitigation Plan (RMP) to detect and prevent unlawful robocalls from originating on its network.

Robocall Mitigation Plan

TCN is committed to taking reasonable and appropriate steps to mitigate originating unlawful robocall traffic on its network. Because the threat and mode of action of unlawful robocalls is ever-evolving, there is no single solution or mitigation strategy that would be effective for all time. As such, this plan may be modified from time to time, as circumstances warrant, in order to reduce and ultimately mitigate the likelihood and occurrence of such calls on our network.

Know Your Customer

TCN has established procedures to prevent new and existing customers from using the TCN network to originate unlawful robocalls. Before new customers are established, and when evaluating existing customers' use of the platform, TCN thoroughly assesses the customer by verifying their identity, their background, the industry in which they operate, and the types of communication they engage in.

Terms of Service

TCN has an acceptable use policy which must be signed by an authoritative person within the customers organization. These terms of service contain provisions that allow TCN to suspend or terminate the services of a customer who engages in unlawful robocalling activities.

Logging, Monitoring, and Analytic Systems

Utilizing multiple mature and established systems, tools, and services developed internally and provided by its infrastructure provider (Google Cloud Platform), TCN logs and monitors all network traffic and activities, and receives alerts and notifications on suspicious patterns.

Recording Keeping

Call detail records are maintained in accordance with contractually defined terms and/or legal obligations. In combination with other logging and metrics activities and records, this allows TCN to effectively identify suspicious patterns and respond efficiently with mitigation actions and to external traceback requests.

Traceback

TCN is committed to responding and cooperating fully within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement agencies, and the industry traceback consortium in investigating and stopping any unlawful robocallers that use its services to originate calls.