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QCSTelecom, Inc Robocall Mitigation Plan

Role: Voice Service Provider with a STIR/SHAKEN implementation obligation serving endusers;

OCN: IPES – 820K

Measures to prevent customers from originating illegal robocalls: QCSTelecom, Inc. proactively meets with our clients on a weekly basis. They provide us with the TNs that they use for origination traffic and provide descriptions of systems that automatically originate traffic, such as notification systems that send automated alerts for building automation systems to on-call personnel. When we have detected automated dialing that appeared to be robocalling, we shut down the traffic in question, met with the client that day, and then proactively engaged our upstream providers that day to provide details of the incident. We also respond immediately to any correspondence or calls from our upstream Intermediate providers that indicate that there is a potential for fraudulent or other suspicious traffic.

Know your upstream provider: We strictly limit upstream providers to large, established carriers with good industry reputations. We have met several times with each of our upstream carriers in the past 2-3 years as we deployed STIR/SHAKEN compliance measures.

Call analytics systems: We do not employ call analytics systems from third parties. We set limits on a per client and per TN basis for call rates that exceed thresholds, such as number of calls to certain destinations or the number of originated calls from a given TN. We periodically examine aggregate call detail records to examine whether signs of robocalling exist among customers or the TNs in use.