

TC Telecom, LLC (dba Advanced VoIP Solutions) is committed to providing a reliable and secure communication experience for our customers. **While we are not a Covered Service Provider** under the FCC's STIR/SHAKEN framework, we recognize the growing problem of robocalls and are dedicated to implementing proactive measures to mitigate them within our network.

We operate a VoIP network that does not have direct access to the PSTN. All of our calls (inbound or outgoing) are routed through wholesale voice providers who handle termination on the PSTN.

That said, while STIR/SHAKEN isn't mandatory for us, we are implementing the following strategies to combat robocalls:

1. **Suspicious Call Pattern Detection:** We employ automated systems on our switch to detect suspicious call patterns, such as high call volume from a single number within a short period. Identified calls could be flagged for review or potentially blocked.
2. **Educational Resources:** We provide educational resources to our customers about robocalls, including tips on how to identify and avoid them. This includes information on recognizing common robocall tactics and reporting them to the proper authorities.
3. **Collaboration with Wholesale Providers:** We work collaboratively with our wholesale voice providers to explore additional robocall mitigation strategies at their level, potentially including information sharing and joint efforts to identify and block robocall traffic.
4. **Device Security:** All our provided phones are Yealink models, known for their robust security features. We enforce mandatory password protection for all Yealink phones within our network. This prevents unauthorized access to the phone's features and functionalities, including making outbound calls.
5. **Switch Security:** We utilize FreeSwitch as our open-source PBX platform. To further enhance security, we have implemented a unique registration process for all devices attempting to connect to our FreeSwitch server. In addition to the standard username and password authentication, each device must possess a pre-configured registration key. This key is unique to each device and is handed out during initial provisioning.

Continuous Improvement:

We are committed to staying informed about the latest robocall mitigation techniques and regulations. We will continuously evaluate the effectiveness of our program and adapt our strategies as needed to ensure the best possible protection for our customers.

Thank you for your time.