

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Call Authentication Trust Anchor) **WC Docket No. 17-97**
) _____)

**CERTIFICATION OF COMPLIANCE AND
REVISED ROBOCALL MITIGATION PLAN
for
TELUS Communications Inc.**

Submitted by:

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February 27, 2026

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**CERTIFICATE OF COMPLIANCE AND REVISED ROBOCALL MITIGATION PLAN
FOR TELUS COMMUNICATIONS INC.**

TELUS Communications Inc., (“TELUS Canada” or “TELUS”)¹ (FRN 0004-9899-76) respectfully submits this revised Robocall Mitigation Plan (“Plan”) to the Federal Communications Commission (“FCC” or “Commission”) as required under 47 C.F.R. § 64.6305(d).

TELUS Canada submitted its initial Plan on June 11, 2021, along with its affiliated US company TELUS Communications (U.S.) Inc. (“TELUS US”) (FRN 0022-2594-28), when both entities registered with the Commission’s Robocall Mitigation Database. TELUS Canada filed a revised Plan on June 12, 2023. In response to additional requirements as laid out in DA 24-73 RMD Public Notice, TELUS Canada filed a revised Plan on September 12, 2025 to comply with the Sixth Caller ID Authentication Report and Order.

TELUS Canada, a British Columbia corporation, is a foreign voice service provider headquartered in Vancouver, British Columbia, Canada. Its parent company, TELUS Corporation (FRN 0008-8098-32), a British Columbia corporation, holds an International Section 214 Authorization but does not provide voice services in Canada or the United States.² TELUS Canada

¹ TELUS Communications Inc. does not operate under the name “TELUS Canada” nor is it registered with the FCC under this name. “TELUS Canada” is being used for this filing for jurisdictional clarification purposes only.

² See ITC-MOD-20061016-00567. TELUS Corporation is headquartered in Vancouver, British Columbia, Canada.

provides voice, data, broadcasting content, wireless, and related communications services, to enterprise and residential customers in Canada as well as wholesale telecommunications and related services to other Canadian and international telecommunications carriers, internet service providers, and resellers.

As a foreign voice service provider, TELUS Canada both originates and terminates calls within Canada, as well as transports foreign originated traffic for termination into the United States³ or for traversing the United States for termination in foreign jurisdictions. TELUS has the basic STIR/SHAKEN framework in place within its immediate domain as required by the FCC and satisfies the STIR/SHAKEN requirements as established by the Canadian telecommunications regulator, the Canadian Radio-television and Telecommunications Commission (“CRTC”). TELUS Canada is working closely with its US terminating carriers and industry groups to ensure proper authentication of traffic occurs for crossborder traffic (Canada-United States) at handoff.⁴

As detailed below, TELUS Canada is actively taking steps to avoid carrying or processing illegal robocall traffic. TELUS Canada is already committed to responding fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. TELUS Canada is also committed to cooperating with such entities in investigating and stopping any illegal robocallers that use TELUS services to originate, carry or process calls. To the extent possible within its network, TELUS is using STIR/SHAKEN to authenticate unauthenticated SIP traffic carrying NANP numbers in the caller ID field, and, if permitted under

³ Traffic bound for termination into the United States is transported by TELUS Canada’s indirect subsidiary, TELUS US, an intermediate gateway provider registered with the Commission’s Robocall Mitigation Database. Please note there is no change of network facilities at the Canada-United States border, simply the ownership of the facilities changes from TELUS Canada to TELUS US once inside the United States.

⁴ Currently there is no formal agreement between Canada and the United States to support key exchange for crossborder traffic. Traffic originating on TELUS’ Canadian network meets the STIR/SHAKEN requirements set forth by the CRTC.

CRTC rules, will refuse to carry traffic from any provider that is not listed in or de-listed from the Robocall Mitigation Database. Should TELUS Canada receive a request from the FCC to start blocking calls from a certain origination point from entering the United States, TELUS has the capabilities to do so under certain circumstances and in accordance with CRTC rules.

TELUS Canada takes the issue of unwanted and illegal robocalls seriously and has been a longtime activist in helping to locate the origination of nuisance callers in Canada. TELUS Canada has a dedicated internal team of subject matter experts that leverage a centralized contact mechanism to investigate and timely respond to requests from the industry traceback consortium, the FCC, or other governmental authority and will continue to be an active participant where required. TELUS Canada also works with industry groups and other US and Canadian carriers to investigate and mitigate suspected robocalls detected on its network. TELUS Canada is committed to educating its customers about STIR/SHAKEN and the tools available to combat auto-dialed nuisance calls,⁵ and preventing spam and nuisance calls from reaching customers in Canada and beyond.⁶

TELUS Canada has not been prohibited from filing in the Robocall Mitigation Database as a result of any United States Commission Law enforcement or regulatory agency action and none of its certifications have been removed from the Database by the Commission.

In addition to participating in standards bodies and the industry traceback consortium, TELUS Canada has invested its own thought leadership into battling the problem of unwanted

⁵ See, e.g., TELUS Support: STIR/SHAKEN feature for mobile devices explained, available at: <https://www.telus.com/en/support/article/stir-shaken-mobile-devices-explained>

⁶ See, e.g., *TELUS 2022 Sustainability and ESG Report*, at 75, available at: https://assets.ctfassets.net/fltupc9ltp8m/2PXeAJVjBdd8ivjg4ppYUu/d68465666e793708b19e34202a6631a7/TELUS_Sustainability2022EN_04_06_2023.pdf

nuisance and robocalls, and is continually evaluating additional solutions that can protect its customers, and, in turn, all callers from nuisance and robocalls. TELUS Canada has developed a Call Control service, an advanced call filtering system that is very effective at blocking auto-dialed nuisance calls. Call Control was originally available to wireline subscribers, following its success, and has now been expanded to TELUS Mobility users.⁷

TELUS Canada does not use third party vendors to perform call analytics on its network; any network monitoring or analysis is handled internally within the TELUS Canada environment by TELUS employees. While TELUS Canada does not currently have the ability to do any sort of algorithmic or predictive blocking of nuisance calls, it is actively investigating this capability and may deploy a solution in the future.

TELUS Canada is familiar with all upstream carrier partners and has well established procedures for verifying its consumer, enterprise and wholesale customers, including the gathering and reviewing of information such as the customer's physical location, traffic profiles, contact information, and when appropriate, credit worthiness, business registrations, licenses, and taxing authority information for enterprise and wholesale customers. TELUS Canada includes language in its contracts, agreements, and term sheets prohibiting the use of its service for illegal activities. TELUS Canada maintains detailed acceptable use policies for all customers and service offerings, outlining what actions it may take should customers violate these policies, including originating illegal or unwanted nuisance calls.⁸ Customers are made aware of these policies when signing up

⁷ See, e.g., TELUS Support: Call Control for Mobile Devices, available at: <https://www.telus.com/en/support/article/call-control-for-mobile-devices-explained>

⁸ See, e.g., TELUS Unregulated Local Telephone Service Terms, Section 2(c) – Acceptable Use, “You may not use the Services or permit any other person to use the Services for any illegal purpose, or to make annoying or offensive calls.” Available at: <https://www.telus.com/en/support/article/unregulated-local-telephone-service-terms>

for service. These policies are publicly available on the company's website at www.telus.com⁹ and in its tariffs filed at the CRTC.¹⁰

TELUS Canada is committed to stopping illegal robocalls and has put in place the resources necessary to respond to traceback requests and to cooperate with any investigation, including any Notification of Suspected Illegal Traffic inquiry issued by the FCC's Enforcement Bureau.

The required contact information is as follows:

Contact Name: Mark Gilroy
Contact Title: Vendor Manager
Contact Department: TELUS Partner Solutions
Contact Street: 25 York Street
Contact City: Toronto
Contact State, Province: Ontario, M5J 2V5
Contact Country: Canada
Contact Telephone Number: 647-462-7389
Contact Email: traceback@telus.com

TELUS Canada is managed by the following persons:

Darren Entwistle
President and CEO

Andrea Wood
Executive Vice-President and Chief Legal and Governance Officer

Doug French
Executive Vice-president and Chief Financial Officer

Hesham Fahmy
Chief Information Officer

⁹ See, e.g., Policies and Disclosures and User Terms: <https://www.telus.com/en/about/policies-and-disclosures>
Service terms and alerts: <https://www.telus.com/en/on/support/topic/service-terms/service-terms>

¹⁰ See, e.g., TELUS Canada Tariff General/Terms of Service, CRTC 21461 at §107.1(c), available at: https://assets.ctfassets.net/fltupc9ltp8m/75lY4O2OKB16p7IUii1Drl/9bb996bdeee6137716ed869f9c27688a/_items_100-124_General_Terms_of_Service "Customers are responsible to make sure that the services provided to them by the Company are not used: (a) for an illegal purpose, (b) in an illegal manner, (c) to make annoying or offensive calls..."

Jill Schnarr
Chief Communications & Brand Officer

Navin Arora
Executive Vice-president and President, TELUS Business Solutions

Nazim Benhadid
Chief Technology Officer

Sandy McIntosh
Executive Vice-president, People & Culture and Chief Human Resources Officer

Tobias Dengel
Senior Vice-president and Chief Corporate Officer - TELUS Digital

In accordance with Section 1.16 of the Commission's regulations, I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Respectfully submitted,

Signed by:

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Tatiana Folefak Nkuipou,
President
TELUS Communications,
Inc.