

**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 (U.S.) Inc.**

**Submitted by:**

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CANADA

February 27, 2026

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**CERTIFICATE OF COMPLIANCE AND REVISED ROBOCALL MITIGATION PLAN  
FOR TELUS COMMUNICATIONS (U.S.) INC.**

TELUS Communications (U.S.) Inc., (“TELUS US” or “TELUS”) 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 US (FRN 0022-2594-28) submitted its initial Plan as an intermediate provider in conjunction with an affiliated Canadian telecommunications company, TELUS Communications Inc. (FRN 0004-9899-76) (“TELUS Canada”)<sup>1</sup> on June 11, 2021. TELUS US submitted an updated Plan as a gateway provider on December 13, 2022, and filed a further revised Plan on June 12, 2023. In response to additional requirements as laid out in DA 24-73 RMD Public Notice, TELUS filed a revised Plan on September 12, 2025 to comply with the Sixth Caller ID Authentication Report and Order.

TELUS US, a Delaware corporation, provides interstate and international data, telecommunications, and related services to enterprise and carrier customers in the United States as well as supports the US portion of services for TELUS Canada’s enterprise customers’ US

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<sup>1</sup> 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. TELUS Canada is an indirect parent company of TELUS US.

operations. TELUS US operates under TELUS Corporation's (FRN 0008-8098-32) International Section 214 Authorization.<sup>2</sup> TELUS US neither originates nor terminates any voice calls in the United States. Rather, it serves as an intermediate gateway provider between TELUS Canada and US carriers, transporting traffic from the Canada-United States border to TELUS' points of presence ("PoPs") in the United States where its network interconnects with US service providers.<sup>3</sup> The basic STIR/SHAKEN framework is in place and TELUS US is working closely with its US terminating carriers, TELUS Canada, and industry groups to ensure proper authentication of traffic occurs for cross-border traffic (Canada-United States) at handoff.<sup>4</sup>

TELUS is actively taking steps to avoid carrying or processing illegal robocall traffic. TELUS is committed to responding fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and is 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 technically feasible, will refuse to carry traffic from any provider that is not listed in or has been de-listed from, the Robocall Mitigation Database as required by the Commission.

TELUS US takes the issue of unwanted and illegal robocalls seriously. TELUS US'

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<sup>2</sup> See ITC-MOD-20061016-00567, Section 63.21(h) Notice filed on January 30, 2013. TELUS Corporation, a British Columbia corporation, is headquartered in Vancouver, British Columbia, Canada and is the parent company of TELUS Canada. TELUS Corporation does not provide voice services in the United States or Canada.

<sup>3</sup> 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. As such, TELUS US would not technically be able to block traffic from TELUS Canada as it is one continuous network. Any blocking of Canadian originated traffic would fall under the jurisdiction of the Canada Radio-television and Telecommunications Commission ("CRTC").

<sup>4</sup> Currently there is no formal agreement between Canada and the United States to support key exchange for cross-border traffic. Traffic originating on TELUS Canada's network meets the STIR/SHAKEN requirements set forth by the CRTC.

indirect parent, TELUS Canada, has been a long-time activist in helping to locate the origination of nuisance callers in Canada. TELUS 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 also works with industry groups and other US and Canadian carriers to investigate and mitigate suspected robocalls detected on its network. TELUS is committed to educating its customers about STIR/SHAKEN and the tools available to combat nuisance calls,<sup>5</sup> and preventing spam and nuisance calls from reaching customers in Canada and beyond.<sup>6</sup>

TELUS 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 has invested its own thought leadership into battling the problem of unwanted robocalls, and is continually evaluating additional solutions that can protect its customers, and, in turn, all callers from 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 Canada Mobility users.<sup>7</sup>

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<sup>5</sup> 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>

<sup>6</sup> 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](https://assets.ctfassets.net/fltupc9ltp8m/2PXeAJVjBdd8ivjg4ppYUu/d68465666e793708b19e34202a6631a7/TELUS_Sustainability2022EN_04_06_2023.pdf)

<sup>7</sup> 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>

TELUS does not use third party vendors to perform call analytics on its network; any network monitoring or analysis is handled internally within the TELUS environment by TELUS employees. While TELUS Canada does not currently have the capability to do any sort of algorithmic or predictive blocking of nuisance calls, it is actively investigating this capability and any such solution would have a positive effect on TELUS US' traffic control and reduction of nuisance calls.

Finally, TELUS knows its upstream carrier partners and has well established procedures for verifying its enterprise and wholesale customers, including the gathering and reviewing of information such as the customer's physical business location, contact person(s), and when appropriate, traffic profiles, credit worthiness, business registrations, licenses, taxing authority information, and federal universal service fund ("FUSF") contributor status. TELUS includes language in its agreements and term sheets prohibiting the use of its service for illegal activities. TELUS 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 robocalls.<sup>8</sup> Customers are made aware of these policies when signing up for service. These policies are publicly available on the company's website at [www.telus.com](http://www.telus.com)<sup>9</sup> and in TELUS Canada's tariffs filed at the CRTC.<sup>10</sup>

TELUS 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

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<sup>8</sup> See, e.g., TELUS Canada 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>

<sup>9</sup> 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>

<sup>10</sup> See, e.g., TELUS Canada Tariff General/Terms of Service, CRTC 21461 at §107.1(c), available at: [https://assets.ctfassets.net/fltupc9ltp8m/75lY4O2OKB16p7lUii1DrI/9bb996bdeee6137716ed869f9c27688a/ items\\_100-124\\_General\\_Terms\\_of\\_Service](https://assets.ctfassets.net/fltupc9ltp8m/75lY4O2OKB16p7lUii1DrI/9bb996bdeee6137716ed869f9c27688a/ items_100-124_General_Terms_of_Service)

Notification of Suspected Illegal Traffic inquiry issued by the FCC's Enforcement Bureau.

The required contact information is as follows:

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Contact Title: Manager: Vendor Manager  
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Contact State, Province: Ontario, M5J 2V5  
Contact Country: Canada  
Contact Telephone Number: 647-462-7389  
Contact Email: [traceback@telus.com](mailto:traceback@telus.com)

TELUS is managed by the following persons:

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|-------------------------|--------------------------|
| Tatiana Folefak Nkuipou | President & Secretary    |
| Theresa Johnson         | Vice President           |
| Pier Fiorino            | Vice President, Taxation |
| Mario Mele              | Treasurer                |

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  
(U.S.) Inc.