

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan (“RMP”) outlines: (1) the targeted and prudent measures that Tellarc of Florida (“Tellarc”) has implemented to prevent the transmission or handling of unauthorized robocall traffic; (2) Tellarc’s pledge to promptly and comprehensively address all traceback inquiries from the Federal Communications Commission (“Commission”), law enforcement agencies, and the industry’s traceback consortium within a 24-hour timeframe; and (3) Tellarc’s dedication to collaborate with these entities in identifying and halting any illicit robocall activities leveraging our services for call transmission or processing.

ENTITY COVERED:

-Tellarc of Florida
7459 Riverwalk Circle, West Palm Beach, Florida 33411

STIR/SHAKEN STATUS:

- Tellarc has not completed full implementation of the STIR/SHAKEN Caller ID Authentication Framework across its network. We send calls to our upstream provider with telephone numbers that we have purchased from them. They sign the calls for us.

DESCRIPTION OF ROBOCALL MITIGATION PLAN

Purpose

Tellarc is a Voice Service Provider dedicated to stopping illegal calls from originating in its network. Tellarc is a small company and as such, we personally know all of our customers. All of our customers are small “Mom and Pop” businesses that do not engage in any type of robocalls, marketing calls, etc.

Roles in the Call Chain:

Tellarc serves various customer needs. It acts as a Direct Service Provider for small, local business customers. **We do not provide any services for wholesale clients.**

Know Your Customer (“KYC”)

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with Tellarc in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Tellarc’s KYC program involves obtaining specific subscriber information when the customer establishes service. This process includes collecting information such as:

- physical business location(s)
- contact person
- nature of customer’s business

Know Your Upstream Providers

In accordance with the Commission’s directive in Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59 (Rel. May 19, 2023) ¶¶ 49-51, Tellarc provides the following information concerning its upstream voice carriers.

Tellarc receives voice traffic from the following upstream providers:

1) Bulk Solutions, LLC

704 N. King Street

Suite 500

Wilmington DE 19801

2) Telnyx, LLC

311 West Superior St

Suite 504

Chicago IL 60654

According to the RMD, Bulk Solutions and Telnyx are fully STIR/SHAKEN compliant and, to the best of Tellarc's knowledge, information, and belief, Bulk Solutions and Telnyx have been, and will continue to, sign calls transmitted to Tellarc, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Tellarc.

Telephone Number Authorization

A Telephone Number ("TN") based caller identity refers to the originating telephone number included within call signaling protocols, utilized for the purpose of caller screening. This identifier is uniquely linked to a subscriber and serves to establish the outbound caller's identity. Subscribers are authorized to employ a TN as their caller identity under the condition that the TN is either directly administered by Tellarc or secured through Tellarc from one of its partner carriers for subscriber usage.

Tellarc exclusively oversees the TNs utilized by its subscribers, maintaining a comprehensive inventory system to track these numbers and manage their allocation.

Subscribers do not have the ability to alter the TN used to identify their outbound calls

Efforts to Avoid Carrying or Processing Illegal Robocalls

Tellarc is dedicated to the fight against illegal robocalls. We do not permit robocalls on our network. Further, our customers are not sophisticated enough to utilize our service as a robocall platform. Our customers are small business (law firms, restaurant, places of worship, mechanical engineering, etc.) and not only don't have the need to robocalls, but wouldn't know how to do it if they wanted to.

We do not accept transmission of calls from other carriers. All calls going to our upstream carriers are originated on our network by our customers.

Upstream Provider Scrutiny: Tellarc thoroughly reviews the credentials of upstream providers, ensuring they are not listed in the Robocall Mitigation Database (RMD) and that their Robocall Mitigation Plans (RMPs) effectively monitor and mitigate illegal robocall traffic.

Call Blocking: Empowering users with tools to block suspicious calls, supported by both custom and industry-standard number validation databases.

Business Number Registration: Safeguarding legitimate business numbers from being wrongly blocked.

Caller ID Services: Implementing Caller ID name services with fraud mitigation, ensuring accurate caller information is maintained even for flagged calls.

Traceback Requests

Tellarc follows Industry Traceback Group (“ITG”) recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Tellarc devotes sufficient resources to provide prompt and complete resources to traceback requests

Tellarc commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.
Customer Education

Commitment to Cooperate in Investigating and Stopping Illegal Robocallers

Tellarc promptly responds to inquiries from law enforcement and regulators, including the Commission, FTC or state attorneys general seeking traceback or similar information. Tellarc commits to continue to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use Tellarc’s services to carry or process calls

Certifications

Tellarc has not been prohibited from filing in the RMD due to an enforcement action. Tellarc is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

Plan Updates

This plan and industry best practices must evolve to respond to the dynamic nature of mitigating illegal robocalling. Tellarc will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue. In the event of any material change to this plan, Tellarc will republish it to employees, consultants and contractors and file such an update to the RMD within ten (10) days of such update.

Bruce Goldstein
President
Tellarc LLC
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