

ROBOCALL MITIGATION PLAN

Company: TSG Global, Inc.

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Other business names associated with Company: N/A

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TSG Global is a small voice services provider, under 47 C.F.R. § 64.6304, and is in the process of implementing STIR/SHAKEN.¹ Accordingly, TSG Global is required to implement, and certify to, the implementation of a Robocall Mitigation Plan to ensure that illegal traffic does not originate on their networks as they work within the industry to implement STIR/SHAKEN.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

TSG Global's designated contact for Robocall Mitigation issues is:

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TSG Global is not a foreign voice service provider.

¹ Under 47 C.F.R. § 64.6304, small voice service providers are exempt from complete implementation of STIR/SHAKEN until June 30, 2023.

All voice traffic that originates on our network is subject to the following robocall mitigation policies:

- TSG Global is an active member of the Communications Fraud Control Association (CFCA), along with other major telecommunications carriers and businesses in the United States. According to the summary located at <https://cfca.org/>, “the CFCA is a not-for-profit International Association committed to risk management, loss prevention and fraud control through education, information sharing and collaboration. The association is comprised of security and risk management professionals from communications service providers, vendor partners and law enforcement entities working together to stop communication fraud.”
 - Our membership can be verified here: <https://cfca.org/member-companies/>
- We have a heightened internal review process of customers headquartered outside of the United States.
- We require customers operating under the Master Service Agreement and the Company’s Terms of Service to assist in traceback investigations. Below is our Acceptable Use Policy (7.4) located in our Master Service Agreement:

“Customer's use of Service shall comply with TSG's Acceptable Use Policy and Privacy Policy can be found at the following url: <https://tsgglobal.com/acceptable-use-policy/>, and which are incorporated by reference. Such policies are also available through TSG's team upon request and any changes to such policies will be communicated in writing to Customer from time to time. TSG will notify Customer of complaints received by TSG regarding each incident of alleged violation of TSG's Acceptable Use Policy by Customer or third parties that have gained access to the Service through Customer. Customer agrees that it will promptly investigate all such complaints and take all necessary actions to remedy any actual violations of TSG's Acceptable Use Policy. TSG may identify to the complainant that Customer, or a third party that gained access to the Service through Customer, is investigating the complaint and may provide the complainant with the necessary information to contact Customer directly to resolve the complaint. Customer shall identify a representative for the purposes of receiving such communications. Customer shall provide end user account, use case, contact, and other requested information upon request. Requests made will be handled within TSG’s continued commitment to maintain privacy and security.”

- TSG Global’s Terms of Service and/or MSAs contain prohibitions on Robocalling and allow the TSG Global to suspend or terminate service if it determines that the customer is using TSG Global’s services for Robocalling. This is outlined in our acceptable use policy located below:

- <https://tsgglobal.com/acceptable-use-policy/>
- We are in the process of implementing traffic pattern monitoring to detect unusual levels of activity above TSG Global's threshold, and TSG Global customer account thresholds, based on an average of typical customer use, and investigate any anomalies.
- TSG Global is in the process of implementing a customer vetting program, also known as Know Your Customer (KYC), and collects and verifies information about each large commercial customer, and mandate that the customer provide additional information if it requires large capacity calling, including:
 - Tax Number / ID / EIN
 - Country of Registration
 - Business Address
 - Business Website

In addition to the above mitigation efforts, TSG Global will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. TSG Global has also historically consulted with both the FTC and FCC on software-centric fraud mitigation efforts, further demonstrating its commitment to such important efforts.