

Televergence Solutions Inc Robocall Mitigation Plan

Televergence Solutions Inc. for itself and on behalf of its resellers hereby submit this Robocall Mitigation Plan to the Federal Communications Commission pursuant to the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act.

Intro

Televergence is a 30+ year, nationwide telecommunications carrier who provides premium local, long distance and inbound voice services to companies with high call volumes and/or in house contact centers.

STIR/SHAKEN

Televergence has implemented STIR/SHAKEN in partnership with Sansay as the STI-Certificate Authority (STI-CA) service provider. Sansay will interact with the STI-Policy Administrator (STI-PA) on our behalf to ensure that (1) only vetted and approved customers are authorized to sign calls and (2) such customers' calls are signed exclusively with certificates that have been issued by the national level.

To our knowledge, all egress traffic originating from Televergence is STIR/SHAKEN compliant.

We also require that ingress traffic:

- From other service providers to have valid Identity headers in order to pass their traffic as an intermediate carrier;
- That enterprise customers who use directly allocated DID numbers associated with their respective trunks to receive an attestation level of A;
- That enterprise customers who use third party DID numbers supply respective Letters of Authorization to receive an attestation level of B;
- And that all other traffic sourced from enterprise or service providers receive an attestation level of C.

Traceback

Televergence is responsive within an average of 5 hours to USTelecom Industry Traceback Group ("ITG") requests, as we fully participate with the ITG in order to: (1) provide for the robust protection of voice networks and users of such services from fraudulent, abusive, and/or unlawful robocalls; (2) work to reduce the number of illegal robocalls; (3) identify the source of such calls through Trace Back and Trace Forward efforts; and (4) implement Do Not Originate (DNO) procedures when finalized. Televergence will continue to take all necessary steps to ensure that it will not meet the definition of a Non-Cooperative Voice Service Provider.

Televergence is also an active member of the Traffic Pumping Trace Back Group ("TPTG") hosted by SOMOS. The TPTG investigates traffic to determine if the calls are illegal Toll-Free

Traffic Pumping through Trace back efforts. The group includes Resp Orgs, carriers, law enforcement, and other agencies determined to eliminate illegal Toll-Free Traffic Pumping.

Know Your Customer/Provider Framework

Customer Onboarding. Televergence has a stringent on-boarding screening process designed to proactively identify and prevent those that may engage in illegal robocalling from becoming Televergence customers. Televergence requires all new Enterprise, Intermediate, International Gateway and VSP services to pass an extensive Know Your Customer (KYC) process, which also includes additional addendums for certain types of applicants:

Contact Centers are required to provide DNC and TCPA compliance information, information on active campaigns and must agree to stringent traffic pacing requirements;

Service Providers must provide valid FCC Registration Numbers (FRN), Operating Company Numbers (OCN), Robocall Mitigation Database (RMD) IDs and USAC contributor information under our Know Your Upstream Provider model; additionally all service providers must agree to cooperate and respond in a timely manner with Industry Trackback Groups (ITG) requests and agree to follow all applicable laws and best practices against illegal robocalling, fraud and abuse; and End Customers must be in compliance with current E911 and nomadic E911 standards, maintaining their proper per extension address and contact information for PSAP realtime injection.

Existing Customer Review. After initial onboarding, Televergence's technical operations personnel stay closely in communication with our customers. We maintain an extensive database of equipment and their localized configuration, including a vast library of technical manuals for gateways, switches, dialers, routers, firewalls and other possible customer maintained systems. This allows our Technical Assistance Center (TAC) personnel to troubleshoot and assist in correcting issues at speeds far surpassing industry standards.

As part of our first quarter annual customer review process, we require all customers to resubmit their KYC documentation and verify the respective registration information contained within. We re-evaluate all aspects of the KYC and CPNI data for new flags of possible changes that might represent a change in respective traffic.

The TAC group publishes regularly updated "Best Practices" bulletins designed to emphasize the principals of long term profitability not just by adhering to standards but by leading the quadrant in maintaining stable and established contact center customers. Our bulletins cover technical, regulatory, legal and cost management geared to the specific segment of the respective customer's business.

We believe this hand holding approach leads to the shared goal of eliminating illegal robocalling, fraud and abuse; but also customer success and profitability.

Customer Information & Record Keeping

Televergence collects the following information in order to ensure complete transparency and compliance in the case of an investigation:

Residential

End subscribers are asked to provide their physical location, social security number and state identification.

Small/Medium/Large Enterprise Businesses

Business subscribers shall provide billing and physical service addresses for their facilities; additionally, we identify multiple contact persons including owners, state or country of incorporation, their federal tax ID and the nature of the customer's business.

Domestic Contact Centers

Contact center customers provide the same base information as our general enterprise business customers; however they are also asked to provide details about the customer's planned use of our services. We verify that the customer understands the basics of TCPA compliance, call throttling, opt-in and double opt-in lists, the do not call registry and the right to opt out of future calls.

Contact centers will also be required to provide customer information associated with specific campaigns; where possible, we will request copies of call recordings or outgoing message audio to accelerate the investigation process.

Foreign Customers

(including Contact Center Customers and Customers using local NANPA numbers)

Foreign entities must provide the same level of detail as our domestic customers; however, we only will attest outbound at level C upon learning that a customer has facilities or ownership outside of the United States.

Traffic Analysis & Monitoring

Machine learning helps to identify behaviors which indicate illegal call activity over a period of time, such as intermittent bursts of high activity, suspiciously low call completion rates/short call times, false answer supervision and evidence of systematic calling, or "war dialing".

Abnormally high-volume call patterns from a commercial customer can be a symptom of illegal robocalling. Customer accounts are built with specific call per second and simultaneous port utilization limitations that our switching platform enforces. Customers who request an unusually high CPS or port capacity will go through an account approval process that includes a company executive review prior to production traffic.

Investigation of Suspicious Activity

When traffic analysis or external tickets indicate the presence of likely illegal robocalling, our NOC staff immediately identifies and verifies the respective trunk and line elements associated.

If Televergence determines that our customer is the offending party we will pass our investigative results to any entity requesting traceback information and if needed, suspend customers who are generating illegal robocalls and contact relevant law enforcement agencies where warranted.

Attachment A - Company Information

Company Name : Televergence Solutions Inc.
Also Known As : Telvergence or TSI

State of Incorporation : California
Operating Areas : US Domestic 48, AK, HI, PR

Directors : Deb Ward
David Deutsch

Officers : Deb Ward, CEO, President and Founder
David Deutsch, Chief Technology Officer
Octaviano Zavala, VP of Operations
Krisney Flory, Director of Business Development
Ira Globerson, VP of Enterprise & Government Sales

FCC Registration Number : 0018964817
Operating Company Num : 779J
USAC 499 Filer ID : 827994

Abuse Contact Information : email : support@televergence.com
phone : +1.800.286.1700

Mailing Address : Televergence Solutions Inc.
Attn: Regulatory
555 Marriott Dr #315
Nashville, TN 37214