

U.S. TelePacific Corp, dba TPx
Robocall Mitigation Plan
(February 2024)

Introduction

This Robocall Mitigation Plan (RMP) details the reasonable steps and actions taken by U.S. TelePacific Corp, dba TPx ("TPx") to mitigate and eliminate illegal robocalling. TPx has an ongoing commitment to identify and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

TPx provides retail voice and data services. All calls that originate on its network are subject to a robocall mitigation program. TPx has fully implemented STIR/SHAKEN and other robocall mitigation efforts.

The Company is not a foreign voice service provider.

The Company does not sell services to international call originators using North American Numbering Plan Numbers.

Compliance History

In the past two years, the Company (and/or any entity for which the filing entity shares common ownership, management, directors, or control) has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

No prior RMD certification has been removed by the Commission. The Company has not been prohibited from filing in the Robocall Mitigation Database by the Commission.

The person within the Company responsible for addressing all robocall mitigation-related issues, is:

Name: Ken Norris

Title: Sr. Dir., Unified Communications Eng

Department: Network Engineering

Telephone Number: 972-993-4417

Email Address: knorris@tpx.com

STIR/SHAKEN Implementation

TPx has fully implemented the STIR/SHAKEN authentication framework across the entire IP portion of its network, and all calls it originates are compliant with § 64.6301(a)(1) and (2).

The Company uses a third-party vendor/underlying carrier to sign its calls and has its own token.

The Company does not use a third-party call analytics vendor.

Traceback Requests

The Company has established a specific email address for traceback that is directed to all members of the Voice Assurance Team. The on-call member of the team will respond to the request to investigate call detail records as detailed in the request to determine if the traffic is originating from non-owned numbers. Traceback requests will be responded to in 24 hours.

The Company's point of contact to handle traceback requests is:

Name: David Sarvai

Title: Director of Voice Security

Email Address: traceback@tpx.com

Know Your Customer

TPx has implemented Know Your Customer policies when onboarding new or renewing customers to ensure that such customers and providers do not or are not likely to engage in any prohibited conduct. The Company requires a physical business address that passes USPS validation. TPx requires a contact person and a credit check of the business.

TPx will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to TPx's strict and comprehensive Acceptable Use Policies (AUP) prohibiting the act of fraudulent voice activity as a condition of doing business with TPx.

Prospective or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by TPx as a customer and any existing customer relationships could potentially be severed.

Further, TPx's AUP requires all customers to comply with applicable laws and regulations – which would include the Telephone Consumer Protection Act and its implementing regulations, the Telemarketing Sales Rule, regulations implementing the FCC's national Do-Not-Call registry, and all other rules and regulations governing the sending of telemarketing calls and/or robocalls.

Telephone Number Validation:

The Company requires the customer to sign an attestation they have the right to use the telephone number and supply a current bill showing the telephone number is active and assigned to them.

Ongoing Robocall Mitigation

Call analysis is not performed by a third-party vendor. Call Detail Records are analyzed to quantify the amount of B attested calls that are originated per customer. Calling party originators that produce a disproportionate amount of "B" attested calls are contacted to ensure they have the right to use the originating calling number. Customers that are slow to respond may have their calls marked as "SPAM RISK" leaving the network. Non-responsive customers may have their B attested calls blocked from leaving the network.

TPx has direct trunking established with originating service providers. Should the service provider be removed from the RMD, the direct trunks will be removed from service.

Updating TPx's RMD Submission and RMP

Consistent with FCC Regulations, 47 C.F.R. § 64.6305(d)(5), (e)(5) and (f)(5), TPx will update its submission in the RMD within 10 business days of any change to the applicable information it must provide and update in the RMD.

The Company's RMP continues to develop as the Company and the industry gain expertise and deploy new robocall mitigation strategies and will be supplemented in future updates.

ATTACHMENT A

U.S. TelePacific Holdings Corp. Organization Chart

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