

Robocall Mitigation Plan for Telzio, Inc.

Introduction

This document outlines the Robocall Mitigation Plan for Telzio, Inc., a VoIP service provider, in compliance with the Federal Communications Commission's (FCC) regulations as stipulated in the public announcement DA 24-73. Our commitment is to implement effective measures to mitigate unlawful robocalls and protect our subscribers from fraudulent, abusive, and unwanted calls.

Background

The FCC's mandate requires all voice service providers, including VoIP operators, to actively participate in efforts to trace back and mitigate illegal robocalls. Telzio's approach aligns with these regulations, emphasizing transparency, accountability, and continuous improvement in our robocall mitigation strategies.

Governance

- **Oversight Committee:** Telzio, Inc., a privately held company with no parent company, has established a Robocall Mitigation Oversight Committee composed of senior management and key operational staff. Led by Peter Rank Schroeder, CEO, and Diana Chu, COO, who holds primary responsibility for management and control, the committee oversees policy development, implementation, and compliance. Telzio operates independently, without subsidiaries or affiliates.
- **Policy and Compliance:** Regular review and update of policies to ensure alignment with evolving FCC regulations and industry best practices.

Mitigation Measures

- **STIR/SHAKEN Implementation:** Full deployment of the STIR/SHAKEN call authentication framework across our network to verify caller ID information.
- **Advanced Analytics:** Utilization of sophisticated analytics to identify and block suspicious calling patterns and known fraudulent numbers.
- **Carrier and Network Protections:** Telzio actively collaborates with upstream carriers to detect and block abnormal traffic, complemented by the implementation of custom call-blocking rules, which include predefined restrictions on specific area codes and country codes to further enhance the prevention of fraudulent and unwanted calls.
- **Subscriber Tools:** Offering subscribers robust call-blocking and identification tools to empower them in managing unwanted calls.
- **Traceback Cooperation:** Active participation in industry traceback efforts and collaboration with law enforcement and regulatory bodies to identify and take action against illegal robocall campaigns.
- **Consumer Education:** Providing educational resources to subscribers on recognizing and reporting unwanted calls.

Reporting and Compliance

- **Regular Reporting:** Submitting compliance reports to the FCC, detailing efforts and outcomes in robocall mitigation.
- **Know Your Customer (KYC) Compliance:** All new customers undergo a rigorous ID verification process utilizing Stripe and an AI-based system, followed by continuous monitoring and validation of customer activity to identify and address any abnormalities that may indicate potential misuse.
- **Analytics Systems for Detecting and Blocking Illegal Traffic:** Telzio employs a comprehensive approach to threat detection, combining proprietary in-house analytics to identify fluctuations and abnormalities in call behavior with advanced external tools, including TransUnion's phone number reputation service for fraud scoring, and integration with platforms such as MaxMind, Proxycheck.io, Spamhouse, and publicly available open-source AI technologies.
- **Third-Party Analytics Vendors:** Maxmind, Proxycheck.io, Spamhouse, AWS firewall services (with integrated IP reputation scoring from multiple vendors), TransUnion's phone number reputation service.
- **Audit and Assessment:** Conducting annual internal audits and participating in independent audits to assess the effectiveness of our robocall mitigation measures.
- **Record Keeping:** Maintaining detailed records of robocall mitigation efforts, including analytics data, traceback cooperation, and consumer complaints, for at least two years.

Conclusion

Telzio is dedicated to combating the scourge of illegal robocalls through rigorous implementation of this Robocall Mitigation Plan. We pledge to continuously evaluate and enhance our efforts, ensuring our subscribers are protected from fraudulent and unwanted calls, thus fostering trust and ensuring compliance with FCC mandates.