

Teltek Systems, Inc.
Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Teltek Systems, Inc. (“Teltek Systems”) to mitigate and eliminate illegal robocalling. Teltek Systems has an ongoing commitment to scan for 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.

Teltek Systems provides interconnected Voice over Internet Protocol (“VoIP”) calling services. All telecom services are provided on a resale-only basis. As a telecom reseller, Teltek Systems is dependent on our underlying provider’s assistance with monitoring their networks for fraudulent voice calling patterns.

Know Your Underlying Provider

Teltek Systems, Inc. has a master service agreement with VoIP provider partners and has received written assurances from their officials that it has and will continue to sign calls submitted to Teltek Systems, Inc. and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Teltek Systems. Teltek Systems and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

In our research of the prospect, our third-party vendor validates the physical location. Teltek Systems will review the contact information, direct phone number, address, and information from physical and network devices. Teltek Systems will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Teltek Systems’ strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Teltek Systems.

Individuals associated with prospects 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 Teltek Systems as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Teltek Systems is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our

service to make calls. Teltek Systems will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Karla Sanchez
IT Telecom Engineer
443-487-5416

Upon calling our dedicated Traceback Contact, an initial ticket is opened with Network Operations. We will then check SAS call logs and SAS History. If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Teltek Systems immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Teltek Systems and/or obtained by Teltek Systems from Teltek Systems’ underlying carrier for use by the subscriber. Numbers can also be allocated by Teltek Systems or ported using information from previous bill matching customer information. In this case, Teltek requests previous server provider documentation and invoices from the potential subscriber.

For subscribers with multi-line telephone systems, Teltek Systems and our underlying provider only allow calls to be connected if the originating number matches one of the TN’s assigned to the subscriber. This screening capability enables an automated and secure method of validating originating telephone numbers.

International Calling

Teltek Systems is not currently an international voice services provider. If at any time Teltek Systems does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a reseller, Teltek Systems must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

Teltek Systems incorporates provisions into our contract that allow us to suspend service if we suspect illegal calls. We have implemented a blocking software that scans all calls and can stop most unwanted calls before they reach the end-user. We also have call labeling that allows the end user to identify a scam call. The call will still come through, but the end-user will decide whether to answer it.

When we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

Teltek Systems Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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