



Talkie Communications, Inc.

Robocall Mitigation Program

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I. Robocall Mitigation Program Introduction

Pursuant to the applicable orders and regulations of the Federal Communications Commission (“FCC” or “Commission”), the following is the Robocall Mitigation Program (“RMP”) that details the procedures of Talkie Communications, Inc. (“Talkie”), a Maryland corporation to prevent unlawful robocalls from originating, terminating, or being carried or processed on Talkie’s voice network where it is operating as a Voice Service Provider. Unless defined differently herein, capitalized terms used herein have the same definitions as set forth under 47 C.F.R § 64.6300.¹

A. Company Summary

Talkie is small, family-owned communications service provider that currently and largely provides retail, facilities-based, high-speed broadband, VoIP, home security, home automation, and IPTV services to customers in various areas of Maryland and most recently, Delaware. It will soon be expanding in Pennsylvania. Talkie maintains a fiber-optic network, which includes deploying Fiber-to-the-Home/Premise (“FTTH/P”) network or connecting its fiber network to fixed-wireless equipment, to deliver such competitive service offerings to end users. Talkie continues to expand its facilities-based network. With its facilities-based offerings, Talkie only offers on-net retail VoIP services, which are provided over Talkie’s fiber network, to residential and commercial (typically small business) end users. Talkie also provides mobile, wireless services as a Mobile Virtual Network Operator (“MVNO”) that resells wireless services.²

For its VoIP services Talkie offers over its facilities-based high-speed broadband network, Talkie only serves as Voice Service Provider. It is not an Intermediate Provider (i.e., it is not a Gateway Provider and is not a Non-Gateway Intermediate Provider). Talkie’s Operating Company Number (“OCN”) is 885H. Inteliquent, Inc. (“Inteliquent”) serves as Talkie’s sole Intermediate Provider (which Talkie is directly connected to) and Talkie does not directly connect to any other provider in its provision of voice services, so all voice traffic that Talkie originates or terminates on its network is carried or processed by Inteliquent.

With respect to the wireless voice services Talkie offers as a MVNO, Talkie is a

¹ Within this RMP, Talkie has implemented rules established under the FCC’s *Sixth Report and Order* along with its *Seventh Report and Order*. See *Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, *Seventh Report in Order* in CG Docket 17-59 and WC Docket 17-97 et al., FCC 23-37, at Appendix A (rel. May 19, 2023) (“*Seventh Report and Order*”); see also *Advanced Methods to Target and Eliminate Unlawful Robocalls; Call Authentication Trust Anchor*, WC Doc. No. 17-97, *Six Report in Order* and Notice of Proposed Rulemaking, FCC 23-18, at Appendix A (rel. Mar. 19, 2023) (“*Sixth Report and Order*”).

² Talkie’s ultimate, underlying wireless provider is AT&T Mobility and could be others.



Voice Service Provider that only resells the voice services provisioned by its ultimate, underlying wireless provider(s), which also controls the network to implement STIR/SHAKEN on the wireless network.

B. Filing of RMP and Implementation of STIR/SHAKEN

In submitting this RMP with the Commission, Talkie has certified that (a) all of the calls it originates on its network are subject to this RMP, (b) its prior certification has not been removed by Commission action and (c) it has not been prohibited from filing in the Robocall Mitigation Database (“RMD”) by the Commission.³

Pursuant to 47 C.F.R. § 64.6305(d)(1)(i), Talkie has also certified that it has fully implemented STIR/SHAKEN across its network and all calls it originates are compliant with 47 C.F.R. §§ 64.6301(a)(1) and (2).⁴

Pursuant to 47 C.F.R. § 64.6305(d)(2)(ii) and (iii), Talkie’s RMP, which has been uploaded into the RMD, reflects the “reasonable steps to avoid originating illegal robocall traffic” and includes “a commitment to respond within 24 hours 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.”

Pursuant to 47 C.F.R. § 64.6305(d)(4)(vi), Talkie’s role in the call chain includes being:

- A Voice Service Provider with a STIR/SHAKEN implementation obligation serving end-users.⁵

Pursuant to FCC Rule 64.6305(d)(2)(iv),⁶ Talkie states that that during the past two years, it (and/or any entity for which Talkie 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 transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient RMD certification or

³ 47 C.F.R. § 64.6305(d)(1).

⁴ This applies where Talkie offers facilities-based services.

⁵ This applies where Talkie offers VoIP service over its facilities-based broadband network. With respect to wireless voice services Talkie offers as a MVNO, Talkie is also a Voice Service Provider without a STIR/SHAKEN obligation because it only resells the voice services provisioned by its ultimate, underlying wireless provider (which is currently, AT&T Mobility and could be others), which also controls the network to implement STIR/SHAKEN on the wireless network.

⁶ 47 C.F.R. § 64.6305(d)(2)(iv).



RMP description.

II. Robocall Mitigation Program

This RMP applies to Talkie's calling platform (which is IP-based) and provides information on the topics that are discussed in turn below which detail the specific reasonable steps Talkie has taken to avoid originating, terminating, or carrying or processing illegal robocall traffic:

- (1) Implementing Knowing Your Customer and Upstream Provider Protocols
- (2) Requiring Contractual Provisions to Mitigate Illegal Robocalls
- (3) Validating Customer's Right to Use Telephone Numbers
- (4) Only Accepting Traffic from Providers that Have Affirmatively Filed in the RMD
- (5) Analyzing and Monitoring Network Traffic Routing Through Talkie's Network
- (6) Investigating Suspicious Calling Patterns
- (7) Ensuring Foreign Providers Are Not Using Talkie to Carry or Process High-Volume Illegal Traffic onto the U.S. Network
- (8) Authenticating Voice Traffic
- (9) Responding to Commission, Law Enforcement and ITG Traceback Requests within 24 Hours
- (10) Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues
- (11) Updating Talkie's RMD Submission and RMP
- (12) Training Employees

1. Implementing Knowing Your Customer and Upstream Providers Protocols

The FCC requires that a Voice Service Provider's RMP "describe with particularity" its robocall mitigation techniques as follows: (1) a Voice Service Provider must describe how it is meeting its existing obligation to take affirmative, effective measures to "know its customers" and prevent new and renewing customers from originating illegal calls; and (2) Voice Service Provider must describe any "know-your-upstream provider" procedures in place designed to mitigate illegal robocalls.⁷ To comply with the requirements to describe their "new and renewing customer" and "know-your-upstream provider" procedures, such providers must describe any contractual provisions with end-users or upstream providers designed to mitigate illegal

⁷ See 47 C.F.R. §§ 64.6305(d)(2)(ii); see also *Sixth Report and Order*, FCC 23-18, ¶ 40; *Seventh Report and Order*, FCC 23-37, ¶¶ 3 & 49.



robocalls.⁸ Talkie's contractual provisions with its customers are described in Section 2 below.

Talkie has implemented Know Your Customer and Upstream Provider procedures used 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. As indicated in Section 4, below, if the customer is a Voice Service Provider, Gateway Provider, Non-Gateway Intermediate Provider, Foreign Voice Service Provider, and/or Foreign Intermediate Provider, Talkie confirms (via Inteliquent), as a facilities-based, Voice Service Provider that the provider sending voice traffic to Talkie is appropriately listed in the FCC's RMD and has not been delisted pursuant to an enforcement action before accepting traffic from the provider. As indicated above, Inteliquent serves as Talkie's sole Intermediate Provider, which is currently and appropriately listed in the RMD, and Talkie does not, as a facilities-based provider, directly connect to any other provider, so all traffic that Talkie originates or terminates is carried or processed by Inteliquent.⁹

In addition, when signing up new end user customers that will receive on-net VoIP services over Talkie's facilities-based broadband network, Talkie sufficiently vets

⁸ See *Sixth Report and Order*, ¶ 40 and n.154 (explaining that “[w]e do not expect providers to necessarily submit contractual provisions, but to describe them in general terms, including whether such provisions are typically included in their contracts.”); *Seventh Report and Order*, FCC 23-37, ¶¶ 3 & 49 (explaining that “[i]n general, we expect voice service providers will need to exercise due diligence before accepting traffic from an upstream provider, and may want to collect information such as “obtaining the [voice service provider’s] physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the [voice service provider’s] business. We do not find that collecting this information is either uniformly necessary or sufficient, and voice service providers may need to take additional steps, such as adopting contract terms that allow for termination and acting on those terms in the event that the upstream provider attempts to use the network to carry or process a high volume of illegal traffic.” While the Commission “do[es] not expect perfection,” “all voice service providers must take effective steps, and if a voice service provider carries or transmits a high volume of illegal traffic that primarily originates from one or more specific upstream providers, the steps that provider has taken are not effective and must be modified for that provider to be in compliance with our rules.”).

⁹ With respect to the wireless voice services Talkie offers as a MVNO, Talkie is also a Voice Service Provider without a STIR/SHAKEN obligation because it only resells the voice services provisioned by its ultimate, underlying wireless provider (which is currently, AT&T Mobility and could be others), which also controls the network to implement STIR/SHAKEN on its wireless network. In this capacity, Talkie relies on AT&T Mobility and/or any other ultimate wireless provider(s) Talkie utilizes to ensure that such provider(s) knows its/their upstream providers.



such customers. For instance, as part of the vetting process, Talkie collects information such as physical location, contact person(s), and for small businesses, the nature of the customer's business, among other things. Doing so is necessary to provide a prompt response to traceback requests and enforcement efforts.

With these measures and procedures along with those discussed in Section 3, below, Talkie takes "affirmative, effective measures to [(1)] prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic"¹⁰ and (2) know its upstream providers.¹¹

2. Requiring Contractual Provisions to Mitigate Illegal Robocalls

In satisfaction of the FCC's requirements that a provider "know its customers" ¹² procedures, below are descriptions of Talkie's contractual provisions with end-users that are designed to mitigate illegal robocalls.

For Talkie's VoIP services offered over its facilities-based broadband network, Talkie's voice service customers are subject to Talkie's [Terms of Service](#), which includes provisions that (a) prohibit customers from using Talkie's services in a malicious manner, (b) permit Talkie to terminate service to its customers at any time and with or without notice to its customers, and (c) permit Talkie to access customer accounts and records to investigate complaints or allegations of abuse or unauthorized uses without disclosure to customer unless required by law. Under its Terms of Service, Talkie has the right to revise its Terms of Service from time to time without notice, and that the customer is responsible for compliance with the then current Terms of Service.

With respect voice offerings associated with Talkie's wireless services that it offers as a MVNO (where AT&T Mobility is Talkie's ultimate wireless services provider), such voice service customers are subject to [Talkie Mobile – Terms and Conditions](#), which includes provisions that allow Talkie, per its sole discretion, to suspend or terminate access to services without notice for unlawful or otherwise objectionable use of services or calling.

¹⁰ 47 C.F.R. § 64.1200(n)(4).

¹¹ See *also* 47 C.F.R. § 64.6305(d)(2)(ii).

¹² 64.6305(d)(2)(ii) (which cites the obligation under 47 C.F.R. § 64.1200(n)(4) to "[t]ake affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal traffic.").



3. Validating Customer's Right to Use Telephone Numbers

When Talkie establishes service to a retail end user voice customer, Talkie confirms the end user customer has a verified association with the telephone numbers it uses for its originating telephone calls. In this connection, Talkie either assigns the telephone numbers to its VoIP end user customers or ports an existing end user's customer telephone number onto Talkie's network.

In confirming a new customer's association with its telephone numbers associated with Talkie's VoIP service offered over its facilities-based broadband network, Talkie also utilizes a process whereby the customer enters pertinent information into Talkie's portal. Talkie then, via Inteliquent, sends that information along with a PIN to the losing provider to validate that the information is correct. If any of the information does not match, the losing provider will reject the change.

Moreover, in providing its VoIP services provisioned over its facilities-based broadband network, Talkie preprograms its switch so that it assigns only one Caller ID telephone number to an end user customer (similar to a wireless telephone). With this preprogramming, Talkie's end user customers cannot change the Caller ID telephone number they have been assigned and cannot otherwise engage in spoofing. This preprogramming occurs for all of Talkie's VoIP customers, whether the end user customer ported its telephone number from another provider to Talkie or Talkie assigned the telephone number to the end user customer. In addition, when using Talkie's VoIP service that is offered over its facilities-based broadband network, such end user customers cannot simultaneously send numerous calls over a few voice paths. For these reasons, Talkie does not consider its end user customers to be a high risk of originating illegal robocalls or spoofed calls on Talkie's network. Nevertheless, Talkie has adopted various measures discussed below to prevent the origination of such calls on its network.

4. Only Accepting Traffic from Providers that Have Affirmatively Filed in the RMD

In accordance with FCC rules referenced below and for VoIP traffic offered over its facilities-based broadband network, Talkie (via Inteliquent) only accepts traffic from providers that at a minimum satisfy the following requirements, which is based on calls Talkie receives from Inteliquent that serves as Talkie's sole intermediate provider (and Inteliquent's compliance with these FCC rules):

- Accepting traffic from domestic Voice Service Providers. In accordance with 47 C.F.R § 64.6305(g)(1), Talkie (via Inteliquent) accepts calls directly from a domestic Voice Service Provider only if that Voice Service Provider's filing appears in the RMD and that filing has not been de-listed pursuant to an enforcement action.



- Accepting traffic from Foreign Voice Service Providers or Foreign Intermediate Providers. In accordance with 47 C.F.R § 64.6305(g)(2), Talkie (via Inteliquent) accepts calls from Foreign Voice Service Providers or Foreign Intermediate Providers that use NANP resources that pertain to the U.S. in the caller ID field to send voice traffic to residential or business subscribers in the U.S., only if that foreign provider's filing appears in the RMD in accordance with paragraph and that filing has not been de-listed pursuant to an enforcement action.
- Accepting traffic from Gateway Providers. In accordance with 47 C.F.R § 64.6305(g)(3), Talkie (via Inteliquent) accepts calls directly from a Gateway Provider only if that Gateway Provider's filing (a) appears in the RMD, (b) shows that the Gateway Provider has affirmatively submitted the filing, and (c) has not been de-listed pursuant to an enforcement action.
- Accepting traffic from Non-Gateway Intermediate Providers. In accordance with 47 C.F.R § 64.6305(g)(4), Talkie (via Inteliquent) accepts calls directly from a Non-Gateway Intermediate Provider only if that Non-Gateway Intermediate Provider's filing (a) appears in the RMD, (b) shows that the Non-Gateway Intermediate Provider has affirmatively submitted the filing, and (c) has not been de-listed pursuant to an enforcement action.

Talkie's Know Your Upstream Provider procedure involves checking the RMD to see if the Provider's filing (which is Inteliquent's RMD filing): (a) appropriately appears in the RMD, (b) shows that the provider has submitted the applicable filing, and (c) has not been de-listed pursuant to an enforcement action. As indicated above, Inteliquent serves as Talkie's sole Intermediate Provider, which is currently and appropriately listed in the RMD. Because Talkie does not directly connect to any other provider, all traffic that Talkie originates or terminates is carried or processed by Inteliquent and therefore Talkie satisfies the above requirements.¹³

5. Analyzing and Monitoring Network Traffic Routing Through Talkie's Network

If Talkie observes a high-volume voice traffic on its VoIP network overed over its facilities-based broadband network (which would be highly unlikely for the reasons noted above), Talkie will analyze such traffic to identify and monitor patterns consistent with robocalls. For example, Talkie may employ tools to detect and act on such patterns. Talkie does not use a third-party analytics vendor(s).

¹³ With respect to the wireless voice services Talkie offers as a MVNO, Talkie is also a Voice Service Provider without a STIR/SHAKEN obligation because it only resells the voice services provisioned by its ultimate, underlying wireless provider (which is currently, AT&T Mobility and could be others), which also controls the network to implement STIR/SHAKEN on the wireless network. In this capacity, Talkie relies on AT&T Mobility and/or any other ultimate wireless provider(s) Talkie utilizes to comply with these regulatory requirements.



As discussed in Section 6, below, if suspicious calling patterns are found, Talkie, after further investigation, takes appropriate action to address such behaviors. If the calls are determined to be illegal robocalls originating on Talkie's network, Talkie's service to the end user customer originating such calls will be suspended or terminated. If the robocalls are illegal and terminating on Talkie's network, Talkie will work with its Intermediate provider to address and block such traffic.¹⁴

6. Investigating Suspicious Calling Patterns

In providing VoIP services over its facilities-based broadband network, if Talkie detects a pattern consistent with or specific to illegal robocalls (including large bursts of traffic in small timeframes, low duration subscriber traffic and sequential dialing patterns, or call pattern that is consistent with illegal robocalls), or if it otherwise has good reason to suspect illegal robocalling or illegal spoofing is taking place over its network, Talkie will seek to identify the party that is using its network to originate, route, or terminate these calls and take appropriate action. Such actions Talkie takes 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 name, trademark, or d/b/a name; reviewing complaints; suspending or terminating the party's ability to originate, route, or terminate calls on its network; and notifying law enforcement authorities. Talkie recognizes that foreign originating traffic that uses +1 USA Caller-ID values requires special scrutiny; however, Talkie does not originate foreign originated traffic on its network.

Notably, if calls are determined to be illegal robocalls originating on Talkie's network, Talkie's service to the end user customer will be suspended or terminated in accordance with Talkie's Terms of Service discussed in Sections 2 and 6, above. If the robocalls are illegal and terminating on Talkie's network, Talkie will work with its Intermediate provider to address and block such traffic. To ensure that Talkie's residential and business end users and Talkie's network are protected from illegal and potentially fraudulent call traffic, and consistent with contractual limitations and legal considerations, Talkie takes these appropriate steps to combat such traffic being originated, terminated, or carried or processed on its network.¹⁵

¹⁴ With respect to the wireless voice services Talkie offers as a MVNO, Talkie relies on AT&T Mobility and/or any other ultimate wireless provider(s) Talkie utilizes to analyze and monitor traffic routing through its network

¹⁵ With respect to the wireless voice services Talkie offers as a MVNO, Talkie relies on AT&T Mobility and/or any other ultimate wireless provider(s) Talkie utilizes to investigate suspicious calling patterns. If calls are determined to be illegal calls originating on its voice services it offers as a MVNO, Talkie's service to the wireless customer will be suspended or terminated in accordance with Talkie's Terms of Service discussed in Section 2, above



7. Ensuring Foreign Providers Are Not Using Talkie to Carry or Process High-Volume Illegal Traffic onto the U.S. Network

Pursuant to 47 C.F.R. § 64.1200(n)(5), Talkie takes reasonable and effective steps discussed under Sections 1-6, above, to ensure that “any originating provider or intermediate provider, foreign or domestic, from which it directly receives traffic is not using the provider to carry or process a high volume of illegal traffic onto the U.S. network.”

8. Authenticating Voice Traffic

Pursuant to 47 C.F.R. § 64.6301(a), when operating as a Voice Service Provider in provisioning its VoIP service over its facilities-based broadband network, Talkie does the following (1) authenticates and verifies caller identification information for all SIP calls that exclusively transit its own network; (2) Authenticates caller identification information for all SIP calls it originates and that it will exchange with another Voice Service Provider or Intermediate Provider and, to the extent technically feasible, transmit that call with authenticated caller identification information to the next Voice Service Provider or Intermediate Provider in the call path; and (3) verifies (via Inteliquent) caller identification information for all SIP calls it receives which it will terminate and for which the caller identification information has been authenticated.¹⁶

¹⁶ With respect to the wireless voice services Talkie offers as a MVNO, Talkie relies on AT&T Mobility or/and any other ultimate wireless provider(s) Talkie utilizes to comply with this regulatory requirement.



9. Responding to Commission, Law Enforcement and ITG Traceback Requests

Talkie has been and is committed to fully and timely responding to all such traceback requests from the Commission, law enforcement, and the industry traceback consortium/group (ITG), and will continue to cooperate with such entities in investigating and stopping illegal robocallers that use Talkie's services and network is not utilized for the origination, termination or routing of unwanted and illegal robocalls. In accordance with the FCC's regulations 47 C.F.R. § 64.1200(n)(1) along with 47 C.F.R. § 64.6305(a)(2) and (d)(2)(iii), Talkie will respond to all traceback requests from the Commission, law enforcement, and the ITG well within 24 hours¹⁷ and will cooperate with such entities in investigating and stopping any illegal robocallers that attempt to use Talkie's network and/or services to originate calls. Talkie will take the steps to effectively mitigate illegal traffic when it receives actual written notice of such traffic from the Commission through its Enforcement Bureau and will comply with the requirements of such notice and do so in accordance with the applicable FCC rules.¹⁸

10. Designating an Employee Responsible for Addressing Robocall Mitigation-Related Issues

To further ensure Talkie's network is not utilized for the origination, termination, or carrying or processing of unwanted and illegal robocalls, Talkie provides the following name, title, department, business address, telephone number, and email address of the individual within Talkie that leads Talkie's team that handles robocall mitigation-related issues as well as responds to traceback inquiries from the FCC, ITG, and law enforcement agencies:

Contact Name:	Andrew DeMattia
Contact Title:	Co-CEO
Contact Department:	Main Office
Contact Street Address:	99 Talbot Blvd.
Contact City:	Chestertown
Contact State and Zip Code:	Maryland 21620
Contact Telephone Number:	(844) 582-5543
Contact Email:	Andrew.DeMattia@TalkieFiber.com

¹⁷ This is 24-hour window applies within business days, per rule 47 C.F.R. § 64.1200(n)(1) and as clarified by the Commission. See also FCC 22-37, at n.211.

¹⁸ See 47 C.F.R. § 64.1200(n)(2) and (3).



11. Updates to Talkie's RMD Submission and RMP

Consistent with FCC Regulations, 47 C.F.R. § 64.6305(d)(5), Talkie 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.

12. Employee Training

Finally, it is Talkie's policy that employees responsible for combating robocalling are educated on the Talkie's RMP along with any related implementing procedures and stay appropriately apprised of the latest developments and emerging trends to combat illegal robocalling. Talkie treats this continuing education as a critical piece of its role in the telecommunications ecosystem and its strategic position as a partner in mitigating illegal traffic.