



Foremost Telecommunications
5757 Alpha Road, Suite 110
Dallas, TX 75240-4605
469-554-4014

Robocall Mitigation Program

Foremost Telecommunications network is subject to a robocall mitigation program and has taken the following reasonable steps to avoid the origination, carrying, and/or processing of illegal robocall traffic including but is not limited to the following:

1. Foremost Telecommunications uses technology from TransNexus to monitor our outbound SIP traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reports identifying suspected illegal robocalls and it note if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. We examine the reports and investigate identified calls to determine if our customers are attempting to originate unlawful robocalls.
2. Foremost Telecommunications commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium and to cooperate with such entities in investigating and stopping illegal robocallers that use our service to originate, carry, or process illegal robocalls.
3. Foremost Telecommunications is a small-enough company that we are able to maintain close relationships with the majority of our customers and to date we have not had any known issues with illegal robocall traffic. Foremost requires signed contracts to provide service along with contact, entity type and details including tax number. We follow the caller ID authentication best practices for vetting caller identity and operational legitimacy for new and existing customers as described by the NANC Call Authentication Trust Anchor Working Group. This process includes the collection and review of entity-identifying information to confirm that we have an authenticated relationship with the customer. Foremost reviews any customer (new or otherwise) that seeks access to high-volume origination services and will refuse the request if necessary or add additional conditions for service as necessary.
4. Foremost Telecommunications will suspend and/or disconnect customers determined to be originating illegal robocall traffic.
5. Foremost Telecommunications refuses traffic from any provider that is not listed in the Robocall Mitigation Database.

Additional Information

1. Foremost Telecommunications performs the following roles in the call chain: A Voice Service Provider with a STIR/SHAKEN implementation obligation serving end-users.
2. Foremost Telecommunications has registered with the STI-PA using OCN 319D and has our own certificate issued by TransNexus Certification Authority that we use when authenticating calls we originate.
3. Foremost Telecommunications has not been prohibited from filing a certification in the Robocall Mitigation Database.
4. Foremost Telecommunications does not have a history of law enforcement, regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
5. Robocall Mitigation Primary Point of Contact: Lawrence F. Halcomb, Director
noc@foremosttelecom.com
(469) 554-4403
5757 Alpha Road
Suite 110
Dallas, TX 75240

STIR/SHAKEN Implementation Status/Exemptions

Foremost Telecommunications is a small voice service provider and received the STIR/SHAKEN implementation extension provided by 47 C.F.R. Section 64.6304(a). As of June 2023, Foremost has implemented STIR/SHAKEN for its outbound SIP traffic.

Foremost has portions of its network that cannot support STIR/SHAKEN. As provided by 47 C.F.R. Section 64.6304(d), non-SIP traffic does not require STIR/SHAKEN implementation for those portions of the network which cannot initiate, maintain, carry, process, and terminate SIP calls. Foremost continues to avail itself to the extension provided under 47 C.F.R. Section 64.6304(d) for these portions of our network. Foremost will implement a solution for these portions of its network once a protocol is fully developed and finalized by industry standards and the necessary equipment and software are available on the commercial market.