

## **Telecom Xchange LLC (FRN # 0024601833)**

steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program

### **INTRODUCTION**

By nature, TELECOMXCHANGE (TCXC) is a market place, it does not directly originate calls, it's an exchange platform for communication service providers, We want to ensure that we can pass the new SIP headers requirement by STIR/SHAKEN as described below, our engineering team completed the software development to allow The new SIP Identity headers required by STIR/SHAKEN to be sent back and forth between origination and termination provider. We did this by leveraging the `-h header1[,...[,headerN]]` list of SIP header field names that the B2BUA should pass verbatim from ingress to egress call leg.

**The SIP Identity header is comprised of a web token and parameters, as follows:**

- JSON web token
- Header
- Payload
- Signature
- Parameters
- Info
- Alg
- PPT

As a next step we're working with the sellers (SIP termination providers) to see who are compliant so we can start passing the KYC information for each Caller ID that our customer plans to use to authenticate them and give them a good rating. Customers who wish to authenticate and sign directly with another provider but yet use our platform for termination, our SIP header proxying should do the trick to pass those headers to the termination party.

For none Signed/Verified Caller IDs, our plan is to:

- A) send those calls to the termination carrier and let them decide if they should reject or allow the call to pass for first 3 months until we finally announce that we'll only accept signed / STIR/SHAKEN signed calls only to USA and anything else will be rejected.
- B) If we believe the calls are not legit we also have implemented CLID (Called ID) blocking tools that will in real-time block originating customer traffic and send them a 1<sup>st</sup> warning to stop

the traffic immediately. We also exposed tools to the seller to be able to block the buyer with bad traffic profile in our self-service portal

- C) We have also developed minimum traffic requirement feature that automatically without manual work blocks any suspicious traffic if they violate certain ASR/ACD set by the provider. Screenshots below:

### Block Traffic (CLI starting with):

| Prefix     | Add Date            | Action                 |
|------------|---------------------|------------------------|
| 9542405412 | 2021-06-30 11:15:03 | <a href="#">Remove</a> |

#### Add Blocked CLI

Prefix  
to match empty CLI use  
special value EMPTY

[Add](#)

### Minimum traffic requirements

Block if ASR goes lower than (%)

10

Block if ACD goes lower than (sec)

5

Traffic type

Retail

Leave empty values or set to zero if there are no traffic requirements. Traffic requirements compliance is being calculated based on daily traffic.

### Subscribed buyers

| Buyer                               | Daily ASR | Daily ACD | Daily Minutes | Action                |
|-------------------------------------|-----------|-----------|---------------|-----------------------|
| <a href="#">AcmeInc (acc 9 )</a>    | N/A       | N/A       | 0             | <a href="#">Block</a> |
| <a href="#">AcmeInc (acc 8 )</a>    | N/A       | N/A       | 0             | <a href="#">Block</a> |
| <a href="#">AcmeInc (acc 4 )</a>    | N/A       | N/A       | 0             | <a href="#">Block</a> |
| <a href="#">AmeedTest (acc 40 )</a> | N/A       | N/A       | 0             | <a href="#">Block</a> |
| <a href="#">AmeedTest (acc 40 )</a> | N/A       | N/A       | 0             | <a href="#">Block</a> |
| <a href="#">AmeedTest (acc 40 )</a> | N/A       | N/A       | 0             | <a href="#">Block</a> |

## **Traceback Cooperation**

- TelecomXChange LLC will cooperate in traceback investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, TelecomXChange LLC will dedicate sufficient resources to provide prompt and complete responses to traceback requests from law enforcement and from US Telecom's Industry Traceback Group. We have identified a single point of contact in charge of responding to these traceback requests and will respond to traceback requests as soon as possible within 24 hours, excluding weekends and all major holidays.
- TelecomXChange LLC will require traceback cooperation. For all new and renegotiated member agreements governing the transport of voice calls, our policy will specify the use of best efforts to require cooperation in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.

## **Vertting Process:**

**before we let anyone into our platform we request them to provide their complete KYC information such as :**

- **Company Name**
- **Full Address**
- **Phone Number (Verified with 2FA)**
- **Company Registration Papers (Articles of Incorporation)**
- **Email address(s)**
- **SIP, SMPP Network, IP-Adresse(s)**
- **Acknowledgment and Agreement to Terms of use policy where its highlighted that short SPAM calls are not permitted and will result to account permanent closure.**

## **Date Retention policy**

We have also updated our CDR retention policy to keep records for 3 years. So that if any queries come related to any Call we are able to provide full CDRs, Buyer information, Ips, Phone number and other details to the legal authorities.