

Telonium Communications, LLC
Robocall Mitigation Plan
Version 1.1 - April 2024

STIR/SHAKEN IMPLEMENTATION

Telonium Communications, LLC (“Telonium” or “Company”) is a small voice service provider and is therefore exempted from requirements of 47 CFR 64.6301 through June 30, 2023, per 47 CFR 64.6304 - Extension of the implementation deadline. The Company’s upstream/downstream provider for inbound and outbound traffic, {REDACTED}, has completed its complete STIR/SHAKEN implementation. The Company’s internal procedures and monitoring for robocalling are described below.

ROBOCALL MITIGATION

The FCC Order lists three affirmative obligations for voice service providers: (1) Respond to traceback requests from the Commission, civil and criminal law enforcement, or the Industry Traceback Consortium; (2) Take steps to effectively mitigate illegal traffic when it receives notification of such traffic from the Commission through its enforcement bureau; and (3) implement effective measures to prevent new and current customers from using its network to originate illegal calls.

1. Traceback

The Company provides a general contact, {REDACTED}, in addition to a point of contact (below) who can research any calls that traverse the Company’s network. The Company uses software that archives CDR data and contains the origination and termination information of each call. Telonium utilizes username and password authentication and archives all attempts to make telephone calls on the Company’s network. These archives can be used to provide information to the Industry Traceback Group.

The Company commits to respond fully, within twenty-four (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 illegal robocalls that use its service to originate, carry, or process illegal robocalls.

Traceback Point of Contact:
{REDACTED}

2. Take Steps to Mitigate Illegal Traffic

The Company has implemented firewalls with GeoIP functionality to enable blocking of entire country IP blocks if not required by its customers who are primarily located in the USA. The Company's Terms of Service specifically prohibit any illegal, fraudulent, improper, or inappropriate calls. If the Company believes its voice services have been used for unlawful or inappropriate purposes, the Company may immediately terminate the customer's service.

The Company has fully implemented STIR/SHAKEN within its own infrastructure in accordance with the *Sixth Caller ID Authentication Report and Order*, and this document has been updated to reflect the latest compliance.

Beginning May 24, 2024, The Company will stop accepting traffic from any non-gateway intermediate provider not listed in the Robocall Mitigation Database.

3. Measures to Prevent the Origination of Illegal Calls

3.1 Telephone Number Validation

The Company requires all end users who request to port numbers to Telonium's network to provide a Letter of Authorization in addition to a copy of the latest (less than 30 days old) telephone bill showing proof of ownership before associating the number to the end user. This manual validation process controls and limits the use of arbitrary phone numbers being used in a call originating from Telonium's network.

3.2 Outbound Caller ID Assignment

Telonium customers are not authorized to change the caller ID number on outbound calls other than the vetted numbers associated with their account. The Company's downstream provider will sign any outbound calls originating from Telonium's network with "A" or full attestation if the phone number matches the number that the provider provides to Telonium. In the event that a number is not published that is not assigned to Telonium's network, the Company's downstream provider will sign these calls with a "B" or partial attestation.

3.3 Call Blocking

The company will block traffic from any customers using telephone numbers that are not owned by the customer. The exemption of the previous statement is when the call is part of the remote call forwarding service, which then, requires that the inbound call must be properly authenticated. If the Company receives complaints, the Company will investigate and terminate service if necessary. The Company's current telephone

number provider complies with STIR/SHAKEN before the inbound calls reach Telonium's network and will continue to provide this functionality.

4. Acceptable Use Policy

The Company has prepared a Service Use Restrictions Policy ("Policy") as a guide for its customers to understand the intended and permissible uses of our service, and to prevent exploitation, fraud, and abuse of our unlimited calling plans and features. This Policy is applicable to all our services and can be found at the following link:

<https://www.telonium.com/terms>

CONCLUSION

The Company submits this robocall mitigation plan, to comply with the Federal Communications Commission's Fourth Report and Order (FCC 20-187). This plan is a work in progress and will be supplemental as the company gains more exposure to and experience with these processes.