

TelNet Worldwide Robocall Mitigation Plan

PURPOSE

TelNet Worldwide hereby commits to stopping illegal robocalls from originating on its network and monitoring its customers' calls in accordance with the FCC regulations. The goal of this document is to explicitly define TelNet's actions, processes, and implementations necessary to comply with the FCC robocall mitigation requirements.

TELNET WORLDWIDE'S ROBOCALL MITIGATION MEASURES

1. STIR/SHAKEN Implementation

TelNet Worldwide has implemented full STIR/SHAKEN authentication to all originated traffic in partnership with TransNexus as the STI-Certificate Authority (STI-CA) service provider.

2. Traceback Requests

TelNet Worldwide is committed to cooperating with and responding to all traceback requests and investigations involving its network or customers within 24 hours. TelNet has a designated team for monitoring, identifying, and investigating any potentially suspicious or illegal call activity who are responsible for engaging with the ITG, FCC, or other legitimate remediation requests and efforts.

3. Know Your Customer

TelNet Worldwide takes a multi-step approach to vetting potential customers who we engage in conversation with. Prior to providing services to a potential customer, TelNet performs the following checks (in no particular order):

- Perform an independent search for contact information to confirm who we are engaged with are who they claim to be.
- Seek out confirmation and validation that the business has a website, consumer reviews, or other online presence.
- Submit the prospective client to a credit check to ensure they pass.
- Validate the business has not been flagged in any FCC industry alerts or blacklists.
- TelNet Worldwide does not accept Cryptocurrency as a form of payment.

- Train sales and customer facing teams in how to identify “red flags” such as: email addresses having similar domains to the business but are misspelled in subtle ways, or if an established business has no interest in porting their existing phone numbers.

4. Network Monitoring Tools & Practices

TelNet has a designated team for monitoring, identifying, and investigating any potentially suspicious or illegal call activity. TelNet also utilizes a 3rd party platform provided by TransNexus which is inserted into **every call** for STIR/SHAKEN implementation, but also for statistical analytics of call routing and pattern identification for robocalling or fraud identification.

TelNet, through the TransNexus platform, participates in and subscribes to databases that are updated regularly by the provider community to help highlight potentially fraudulent destinations that subscribers may be dialing and Do Not Originate lists. Additionally, the TransNexus platform allows TelNet to identify customers with abnormal traffic patterns. Utilizing these data points, TelNet has implemented a variety of thresholds that, when breached, will automatically prompt further investigation.

PROCESS OWNERSHIP AND CONTACT INFORMATION

This Robocall Mitigation Plan is owned, maintained, and approved by TelNet Worldwide’s Robocall Mitigation Team:

Ronald Cabrera	VP of Technology
Damian Chmielewski	President and CEO
Pete Iannuzzi	Senior Voice Core Engineer
Ashley Justman	Director of Customer Operations
Jason Kelsey	Director of Network Operations
Mark Wajer	Chief Technology Officer

Please submit any inquiries through the following contact details:

Support	Traceback
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