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Documentation

ROBOCALL MITIGATION PLAN

FOR FCC

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1. Introduction

TECSSENS®, a trademark owned by Activo TI S.L., offers a voice over IP service for access and termination calls.

At this time, TECSSENS® does not own any numbering other than the one that has been ported to us. We also acquire foreign DDIs for our customers that might need services in their sites spread all over the world, including the United States of America.

We deliver calls originated from our customers to different telecom operators through wholesale and interconnexion circuits

Our customers are only business entities. We don't offer services to domestic users.

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2. Anti-fraud and Security

We have several anti-fraud systems implemented at our platform.

- We have several **warnings** like calls to trouble countries,
- **Expense control:** we have different expense profiles for our customers, and when we see a significant variation we either contact the customer or even temporary disable the service until we can verify everything is in place. To do that, we use, for example:
 - A daily and monthly expense limit. Whenever they reach it, customers will not be able to keep on calling until we clear them up.
 - A list of countries where customer doesn't usually call
 - A list of premium numbers (national and international) where the customer doesn't usually call
- **Origin control:** We block IP for a period of time, whenever we receive requests per minute over a limit.
- **Unfriendly users:** we block requests which comes with from unfriendly user agents, such as "friendly-scanner"
- **Malformed messages:** we protect ourselves against various malformed message attacks

In the past, some of our customers have experienced illegal massive calls to trouble countries due to improper PBX configuration. Whenever this has occurred, we fully collaborate with local authorities to help them managing the incident.

We don't recall any robocall originated calls incident from our customers, but we are prepared to stop them if we identify this might be happening

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3. Collaboration with the Commission

TECSENS® is committed to respond fully to traceback requests from the Commission or law enforcement, and to cooperate with such entities in investigating and stopping any illegal robocallers that might use our service to originate calls.