



Robocall Mitigation Plan

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Teltrex certifies that it has implemented a robocall mitigation program designed to prevent the origination of illegal robocalls in compliance with the Commission's rules.

STIR/SHAKEN Implementation

Implementation in progress. We have engaged a turn-key service to deploy this. We have begun the process and expect to be in full compliance within the next 45 days or less.

For non-IP interconnection where STIR/SHAKEN cannot be applied, we employ the robocall mitigation practices outlined below.

Robocall Mitigation Program

Know Your Customer (KYC)

- Teltrex uses a third party KYC verification platform, Idenfy.com to process KYC information. Once approved, the prospective customer is onboarded.
- Customers must provide accurate and verifiable information during onboarding. If Idenfy.com cannot verify accuracy of customers information, they are declined.
- High-risk customers (e.g., predictive dialer users) are subject to heightened scrutiny and ongoing review.
 - Note: Teltrex only offers service to physical offices that we send technicians to install. We do not offer online setup, SIP trunks, or any form of access to the voice network without a physical location. This helps reduce risk.

Traffic Monitoring & Analytics

- We monitor call patterns for indications of unlawful robocalling, including:
- High call volumes over short durations.
- Large spikes in short-duration or unanswered calls.
- Concentrated calling to certain area codes or numbering resources.

- Automated monitoring systems flag abnormal traffic, which is then reviewed by compliance staff.

Enforcement & Remediation

- Accounts generating suspicious traffic are immediately investigated.
- If confirmed as unlawful, the customer's service is suspended or terminated.
- We block or restrict traffic sources identified as transmitting illegal robocalls.
- Compliance staff documents each incident and retains records of investigations.

Cooperation with Industry & Regulators

- Teltrex responds promptly to traceback requests from the US Telecom Industry Traceback Group (ITG) and law enforcement.
- We cooperate fully with FCC Enforcement Bureau inquiries.
- All traceback and compliance requests are logged and addressed within required timeframes.

Compliance Oversight

- A Compliance Officer has direct responsibility for robocall mitigation.
- A secondary contact has been designated to ensure redundancy in monitoring FCC communications.
- A compliance calendar with deadlines and monitoring tasks is maintained internally.

Point of Contact

All traceback, compliance, and enforcement inquiries should be directed to:

Contact: Liam O'Donnell

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Teltrex is fully committed to preventing the origination of illegal robocalls, protecting consumers, and maintaining compliance with FCC regulations. Our program is subject to periodic review and improvement to ensure continued effectiveness.