



Zoom Telcom, LLC RoboCall Mitigation Compliance with Traced Act

Updated 9/4/2025

Robocall Mitigation Program Plan for Zoom Telcom

Zoom Telcom, LLC (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

STIR/SHAKEN Implementation Status

Zoom Telcom, LLC acknowledges the FCC's mandate for STIR/SHAKEN (Secure Telephone Identity Revisited/Signature-based Handling of Asserted information using Tokens) implementation. As of 2025-09-04, Zoom Telcom LLC has fully implemented the STIR/SHAKEN authentication framework in the IP portions of its network. This full implementation means that all calls originating on our network are signed with STIR/SHAKEN attestations.

Robocall Mitigation Program Details

Zoom Telcom Robocall Mitigation Program encompasses a multi-faceted approach to identify, prevent, and mitigate illegal robocall traffic. Our program includes the following key elements:

- **Network Monitoring and Analytics**
 - Zoom Telcom has deployed and currently utilizes call analytics systems to identify and block illegal traffic originating from or transiting its network. This includes monitoring call patterns, Call

volume, call durations, and answer-seizure ratios, and other anomalous behaviors indicative of illegal robocalling campaigns.

- We currently leverage a combination of in-house tools and third-party vendor solutions for real-time traffic analysis. Vendors listed below.
 - Sansay
 - Bandwidth.com
 - Voyant Communications
- Regular Audits of network traffic will be conducted to identify potential sources of illegal robocalls and to assess the effectiveness of our mitigation efforts.
- **Know your Customer (KYC) Policy and Due Diligence**
 - The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company's networks. The process includes:
 - Monitoring the network to identify suspicious traffic patterns.
 - Limiting customers' capacity via call per second and/or concurrent session limits.
 - Regularly checking call patterns for possible abusive traffic.
- **Traffic Management and Blocking**
 - Zoom Telcom, LLC will actively block calls identified as illegal robocalls based on network analytics, traceback requests, and credible reports of illegal activity. This blocking is implemented in a manner consistent with FCC rules, ensuring that legitimate calls are not inadvertently blocked.
 - In cases where a customer is identified as originating illegal robocalls, Zoom Telcom, LLC will take swift action, which may include:
 - Issuing warnings and requiring corrective actions.
 - Implementing call volume restrictions or rate limits.
 - Suspending or Terminating services, in accordance with contractual agreements and FCC Regulations.
- **Response to Traceback request and Cooperations with Authorities**
 - Zoom Telcom commits to responding within to all traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Consortium (ITC). This includes providing all requested information to assist in identifying and stopping illegal robocalls.

- We will Cooperate Fully with investigation conducted by the FCC, law enforcement, and the ITC into illegal robocalling activity originating from or transiting our network.
- Our Designated POC for robocall mitigation related issues is
 - Tyler Cobb
 - CTO
 - Owner
 - 681 N Main ST
 - Wrens, GA 30833
 - 762-245-6440
 - tcobb@zoomtelcom.com
- **New Customer Vetting**
 - All new customers are verified with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.
- **Continuous Improvements**
 - This RMP will be periodically reviewed and updated to reflect changes in the FCC Regulations, industry best practices, and the evolving tactics of illegal robocalls.
- **Right to Refuse Calls**
 - The Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

Zoom Telcom, LLC has two upstream providers from which it receives voice traffic:

1. Bandwidth Communications, 2230 Bandmate Way,
Raleigh, NC, USA 27607
Phone: 855-864-7776

2. Voyant Communications, LLC, 1 North Wacker DR Suite 2500
Chicago Illinois 60606
Phone: 217-862-1953

Regulatory Compliance Case

Zoom Telcom, LLC was found out of Compliance for the Robo Call Mitigation Database on Aug 25, 2025. Zoom Telcom, LLC has not updated the Robocall Mitigation Plan or Certification to remain Compliant with the program. The status of the investigation is Zoom Telcom, LLC has fixed its issues by updating its plan and has been cleared by the Bureau and put back in the Database. The bureaus that filled the investigation was the Wireline Competition Bureau and Enforcement Bureau.

Principles of Zoom Telcom, LLC

Darryl Davis – CEO

Holder Davis - VP

Lamar Doolittle – CFO

Albert Carter – COO

Tyler Cobb -CTO