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TekSavvy Solutions Inc

800 Richmond Street
Chatham ON N2M 5J5

TELEPHONE +1 519 360-1575 **FAX** 519.360.1716
TOLL FREE 877-779-1575 **teksavvy.com**

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RE: TekSavvy Solutions Inc. – Robocall Mitigation Plan

TekSavvy Solutions Inc. (“**TekSavvy**”) submits this Robocall Mitigation Plan (“**RMP**”) in connection with TekSavvy’s registration with the Federal Communications Commission’s (“**FCC**”) Robocall Mitigation Database (“**RMD**”).

TekSavvy (OCN 548H) is a foreign voice service provider headquartered in Chatham, Ontario, Canada. As a foreign voice service provider, TekSavvy both originates and terminates calls within Canada, and uses third party intermediate providers to transport: (i) Canadian-originated traffic for termination into the United States; (ii) Canadian-originated traffic traversing in the United States for termination in foreign jurisdictions; and (iii) foreign-originated traffic traversing in the United States for termination in Canada. All third-party intermediate providers used by TekSavvy for such purposes have filed reports in the FCC’s Robocall Mitigation Database.

TekSavvy submits this RMP describing the status of its implementation of STIR/SHAKEN and the practices and procedures TekSavvy has in place to mitigate illegal robocalls as of the date of this RMP. TekSavvy may modify, add, delete, or otherwise alter any of the policies and procedures described in this RMP at any time to respond to changes in its business, its capabilities, and its needs.

STIR/SHAKEN Implementation

As of the date of this RMP, TekSavvy has implemented STIR/SHAKEN.

TekSavvy implements STIR/SHAKEN through use of the NetNumber Guaranteed Caller and TNS Call Guardian Authentication Hub. This is a managed end-to-end call authentication solution that fully satisfies STIR/SHAKEN requirements. It provides a standardized approach to call authentication and verification (STIR – RFC 8224, RFC 8225, RFC 8226 and SHAKEN – ATIS-1000074-E, ATIS-1000080, ATIS-1000082).

As of the date of this report, 100% of TekSavvy’s SIP traffic is attested. TekSavvy also implements the Robocall Mitigation Plan set out below.

Robocall Mitigation Plan

TekSavvy relies on third-party carriers to terminate traffic in the United States. These third-party carriers have all filed in the FCC's Robocall Mitigation Database.

This Robocall Mitigation Plan describes the specific measures that TekSavvy has implemented to detect and prevent illegal robocalls on its network as of the date of this RMP. TekSavvy will periodically evaluate the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described. Should TekSavvy determine that changes are appropriate, its practices may differ from those described below.

Risk Assessment: TekSavvy is a foreign voice service provider based in Canada, offering a variety of voice calling services. Its customers generally do not originate high volume calls and TekSavvy has not received information suggesting that robocalls are originated on its network. Therefore, TekSavvy does not consider its network at high risk of originating illegal robocalls.

Measures to Prevent or Avoid the Origination of Illegal Robocalls

- TekSavvy has implemented STIR/SHAKEN.
- TekSavvy has established procedures for verifying its business and wholesale customers, including collecting and reviewing the customer's physical business location, contact information, and when appropriate, business registrations.
- TekSavvy has in place an enforceable acceptable use policy applicable to all customers and service offerings, defining circumstances by which it will deny, suspend, or terminate a service to such customers and other actions it may take should customers violate the policy. Customers are made aware of this policy when signing up for the services and it is also publicly available on TekSavvy's website at www.teksavvy.com/policies/legal-stuff/.
- TekSavvy also has in place internal processes and designated individuals who respond to fraud alerts in order to address and prevent fraudulent traffic on its network.
- TekSavvy uses TNS Call Guardian analytics technologies and services to monitor traffic on its network and identify potentially unlawful call origination activity. If TekSavvy has a reasonable basis to believe that a customer is originating illegal robocalls, it will require the customer to remedy the problem and, if effective action is not taken, TekSavvy can suspend and/or terminate service to the customer.
- TekSavvy blocks Calls originating from invalid numbers in accordance with Compliance and Enforcement and Telecom Regulatory Policy CRTC 2018-484 (Implementation of universal network-level blocking of calls with blatantly illegitimate caller identification).
- TekSavvy has seven upstream providers. Each has procedures in place designed to mitigate illegal robocalls, is registered on the RMD, and is subject to related Canadian regulatory obligations.
- TekSavvy is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

Responding to Traceback Requests

- TekSavvy has designated an individual as a dedicated point of contact for addressing traceback requests, and a backup person to that individual.
- TekSavvy will respond promptly to inquiries received from the CRTC, Canadian Anti-Fraud Centre, and Canadian Voice Service Providers. If a pattern of questionable activity is detected, TekSavvy will require its customer to remedy the problem and, if effective action is not taken, service to the customer may be suspended and/or terminated.

Cooperation with State and Federal Regulators

TekSavvy is fully committed to cross-border STIR/SHAKEN and traceback compliance once applicable standards and policies are defined by the various stakeholders.

TekSavvy has deployed call authentication, call labeling, and call blocking services provided by TNS. We have made great strides to protect our networks and consumers from harmful calls. TekSavvy is pleased to play a role in that improvement and will continue the necessary work to protect our customers.

Affiliated entities covered by TekSavvy's Robocalling Mitigation Plan:

Under FCC policy, providers are required to provide information regarding their ownership in sufficient detail to facilitate the Commission's ability to determine whether the provider has been prohibited from filing in the Robocall Mitigation Database. TekSavvy Solutions Inc., a private corporation organised under the laws of the Province of Ontario, Canada, is the sole owner and operator of its voice services that are managed in accordance with this Robocall Mitigation Plan. TekSavvy is 100% Canadian owned, with ultimate ownership held by Marc Gaudrault who also serves as Chief Executive Officer of the company.

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