

Robocall Mitigation Plan for Teletech Communication, Inc. (Teletech)

Teletech is a Small Service Provider, serving fewer than 100,000 voice service subscriber lines.

As per 47 CFR § 64.630 Teletech:

1. Authenticates and verifies caller identification information for all SIP calls that exclusively transit its own network;
2. Authenticates caller identification information for all SIP calls it originates and that it will exchange with another voice service provider or intermediate provider and, to the extent technically feasible, transmits that call with authenticated caller identification information to the next voice service provider or intermediate provider in the call path; and
3. Verifies caller identification information for all SIP calls it receives from another voice service provider or intermediate provider which it will terminate and for which the caller identification information has been authenticated.

Teletech commits to respond to all trace back requests from the FCC, law enforcement, the USTelecom Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Currently Teletech provides close to 3000 SIP Trunks for total of 400 customers.

For intermediate provider, Teletech is using Bandwidth in 95% of traffic and VOIP.ms (mostly for failover) in 5%.

To help understand Teletech plan for Robocall Mitigation we need to explain the way Teletech conducts business with its customers.

Teletech is unique in providing comprehensive telecommunication services to its customers.

Here are the most important rules of Teletech service implementation, applied to all customers without exception:

1. Teletech offers its services to business customers only, with physical location in Illinois, Wisconsin, and Indiana.
2. Teletech provides SIP trunks together with on-premise PBX for their termination.
3. Teletech service includes installation and full maintenance for customers.
4. Teletech has exclusive rights to customer PBX programming.

Steps to detect and prevent originating robocall traffic:

100% of Teletech services are based on PBX installed in each customer physical location, with SIP trunks provided by Teletech. All customers PBXes are configured and maintain by Teletech engineers exclusively.

Teletech restricts originating, not authenticated traffic for all its customers.

Every PBX is configured exclusively with verified caller identification information.

Customer can't add any device to the network without Teletech's authorization.
Customer has no access to SIP trunks registration.

Steps to detect and prevent passing robocall traffic:

Less than 1% of incoming traffic is forwarded outside of customers PBXes to employ's cell phones or after hours answering services.
Some of this traffic could be not authenticated.
Currently Teletech is relaying on intermediate provider to detect and stop it.
In addition, Teletech monitors and limits forwarded traffic.