
TELUSION INC

February 11, 2022

Federal Communications Commission
Michael Nemcik, Attorney Advisor
45 L Street NE
Washington, DC 20554

Peter C Beckman
Managing Director

Re: Robocall Mitigation Plan

Three Stamford Landing
46 Southfield Avenue
Stamford, Connecticut
06902

Telusion, Inc. does not offer VoIP service to its customers, and customers must have an existing phone with another carrier, outside of Telusion, Inc, in order to receive or place calls. As such, it is very difficult to use our service as a platform for placing robocalls.

We currently and automatically limit any single account from placing more than 3 simultaneous outbound calls, which massively limits a bad actor's reach.

We review a daily report of the top accounts sorted by incoming and outgoing call quantity and minutes, and take action to review the calling against our Terms of Service when expected levels are exceeded.

Our carrier partners have already implemented STIR/SHAKEN and we are in the process of ensuring that all calls through these carrier partners reach the highest level of Attestation to avoid CallerID Spoofing and limit robocalls on our platform.

We will continue to review our processes and procedures to minimize and eliminate the use of our service for robocalls and CallerID Spoofing, with our goal to protect both our customers and all US Citizens and +1 NANP users from unwanted calls.

Sincerely yours,



Peter Beckman
Managing Director
Telusion, Inc.
