



ROBOCALL MITIGATION PLAN

As a voice service provider and ISP, TCSI, Inc, A subsidiary of TeleComp Holdings, Inc, is committed to cooperating with the Federal Communications Commission (FCC) in preventing and mitigating illegal robocalls. This document describes our Robocall Mitigation Plan (RMP) and the specific measures implemented by TeleComp to prevent and mitigate robocalls in compliance with 47 CFR § 64.6305.

• USER VERIFICATION (Know Your Customer)

During our Sales and Onboarding process TeleComp follows a comprehensive procedure to familiarize ourselves with every customer. This process includes background checks, credit assessments, and manual verification procedures. Our business model is focused on small and medium sized business, local governments, and schools. We avoid doing business with high-risk telecom client categories as well as companies that are based internationally.

• TRACEBACK REQUESTS

TeleComp commits fully to cooperating with the FCC and law enforcement and to cooperate with such entities in investigating and stopping illegal robo-callers that use our service by responding to all such traceback requests within 24 hours. In the event of an investigation we follow 52 Pa. Code, CFR 63.131-137 Confidentiality of Customer Communications, and Information.

In accordance with AS per 47 CFR § 64.6305 (e), TeleComp has designated a point of contact to receive notice of any illegal robocall traffic or other robocall mitigation-related issues.

Designated RMD Contact:

TeleComp Unified Communications
uc@telecomp.com
5104 S Pinnacle Hills Parkway, Suite 200
Rogers, AR 72758

- **OBSERVATION**

Our network monitoring tracks failures, quantities, calls per second, and other metrics to detect robocalling. We immediately investigate any identified suspicious calls to determine if the caller or upstream provider was attempting to originate or transit unlawful robocalls. If we determine that the traffic was likely unlawful, then we warn the customer to stop sending such traffic. If they continue to send traffic that appears to be unlawful, then we terminate their service.

- **ONGOING ROBOCALL MITIGATION PROGRAM**

TCSI has made meaningful investments in network upgrades to implement new functionality to combat illegal robocalls as part of its mitigation program. By utilizing software that identifies blacklisted IP addresses and known offenders, we can block bad traffic automatically. We also track traffic volume, including large bursts of traffic in small timeframes or spikes in usage to prevent illegal activity.

- **STIR/SHAKEN ATTESTATION**

TCSI certifies that it is following the FCC's provisions and is committed mitigating robocall traffic for our customers