

Robocall Mitigation Program Description

1. Provider Information

- **Company Name:** Total.Care Holdings, LLC
- **FCC Filer ID:** 837695
- **OCN:** 179L
- **Contact Person:** Shane Kelly
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- **Contact Phone Number:** +1-801-657-4915
- **Website:** www.callcorp.com

2. Voice Service Provider Type

- Originating Voice Service Provider (a provider that originates calls on its network)
- Terminating Voice Service Provider (a provider that terminates calls to an end-user)

3. STIR/SHAKEN Implementation Status

- **Full STIR/SHAKEN Implementation.**

4. Robocall Mitigation Program Details

Our comprehensive Robocall Mitigation Program includes the following measures to prevent illegal robocalls from originating on or traversing our network:

- **A. Call Analytics and Blocking:**
 - We employ VoIP monitoring software to analyze call traffic patterns for suspicious activities indicative of illegal robocalling, such as:
 - High call volumes to unused or invalid numbers
 - Short call durations combined with high call volumes.
 - Rapid increases in call volume from a specific source.
 - Abnormal calling patterns inconsistent with legitimate customer behavior.
 - Negative consumer feedback or complaints.
 - Based on these analytics, we implement active blocking mechanisms. This includes:
 - **Specific Number Blocking:** Blocking calls from identified illegal robocallers, spoofed numbers, or numbers reported as originating illegal robocalls.
 - We utilize session border controllers (SBCs) configured with dynamic blacklists
 - Our blocking decisions are subject to human review (to prevent false positives). Blocks are manually inputted.

- We have a process for handling legitimate calls that may be inadvertently blocked, including customer support channels for redress and investigation.
- **B. Know Your Customer (KYC) and Vetting Procedures:**
 - We have established KYC procedures for all new and existing customers enabling the auto-dialer feature to mitigate the risk of onboarding bad actors. This includes:
 - Collection and verification of contact information for responsible parties.
 - Assessment of business legitimacy and reputation.
 - If a customer is found to be originating suspicious robocalls, actions taken may include suspension or termination of service.
- **C. Subscriber Robocall Prevention and Education:**
 - We have clear policies against the origination of illegal robocalls, which are communicated to and agreed upon by our customers. Our End User License Agreement (EULA) explicitly prohibits illegal robocalling activities.
- **D. Traceback and Cooperation with Enforcement:**
 - We are committed to cooperating with the FCC, law enforcement, and the Industry Traceback Group (ITG) in investigating and mitigating illegal robocall campaigns.
 - We maintain call detail records (CDRs) for a period of at least 180 days to facilitate traceback investigations.
 - We commit to responding in a timely and cooperative manner.
- **E. Ongoing Monitoring and Program Improvement:**
 - We monitor the effectiveness of our mitigation strategies and adjust them as necessary.

5. Attestation

I certify that Total.Care Holdings, LLC is actively engaged in efforts to mitigate illegal robocalling and that the information contained in this Robocall Mitigation Program Description is true and accurate to the best of my knowledge and belief.

Submitted By:

- **Name:** Shane Kelly
- **Title:** VP Engineering
- **Date:** 2/20/2026