

Teleworks Communications, Inc. Robocall Mitigation Plan

Teleworks Communications, Inc is committed to ensuring compliance with and upholding the standards and requirements of the TRACED Act. As a small Voice Service Provider, we have developed best practices to combat unwanted robocalls and fraudulent VoIP activity. The plan below which outlines the reasonable steps taken to avoid originating illegal robocall traffic is under constant review to tighten and update the steps taken to ensure compliance and is subject to change.

I. Customer Vetting (“Know your customer”)

- Teleworks Communications installs, maintains and supports local Small-to-Medium Sized Businesses in our area exclusively. As a result, we interact directly and in person with all customers.
- Customer data including but not restricted to address, contact persons, nature of the business, federal EIN numbers, the nature of the business, etc. is collected and securely stored in an encrypted database.
- Teleworks Communications assists with all inbound number porting procedures to ensure proper ownership and use of any numbers utilized by a PBX installed by Teleworks.
- All customers are furthermore restricted to the smallest number of call paths per their average needs to combat unnecessary or illicit large call volume.

II. Phone Number Identity Control

- Teleworks Communications handles all Caller ID configurations to ensure the proper use of phone numbers.
- Phone number assignment and management is performed by Teleworks Communications on behalf of its customers.

III. Terms of Service and Acceptable use Policy

- Teleworks Communications is developing addendums to contracts between Teleworks Communications and its clients to outline acceptable use of provided telecommunication services. In addition to requiring end-user assistance in the investigation of fraudulent use, these terms include prohibition of:
 - i. Providing false information about the identity of a sender or origin of a phone call or message sent through equipment provided by Teleworks.
 - ii. Violation of any applicable local, state or federal law in regards to telecommunication traffic sent through equipment provided by Teleworks.

IV. Alerts & Monitoring

- Teleworks Communications is constantly developing and updating real-time monitoring and alerts to ensure prompt notification of unusual or dangerous activity.



V. Blocking

- Any numbers originating from non-compliant U.S. NANP numbers are automatically blocked.
- Teleworks Communications has in place the ability to block any incoming numbers requested by our customers where an automated or end-user accessible system is not available.

VI. Call Authentication

- Our company has obtained a STIR/SHAKEN token and certificate from a recognized Certification Authority. We have uploaded the certificate to our upstream VoIP provider, Bandwidth.com, which facilitates the signing of our outbound calls. All calls originating from our network are signed in compliance with STIR/SHAKEN protocols. This ensures that our outbound traffic is authenticated and mitigates the risk of illegal robocall activity.

VII. Suspicious Activity Investigation

- All potentially fraudulent activity on equipment supplied by Teleworks Communications will be immediately investigated. This action will be undertaken regardless of the source; be it internal notification, carrier notification, client complaint or authority contact including but not limited to the ITG, FCC and law enforcement.
- Teleworks Communications has in place tools and means to immediately suspend outgoing calls from any number managed by our company in the event that illegal or prohibited use is detected.

VIII. Carrier Compliance

- As any efforts on the part of Teleworks Communications to secure against fraudulent calls could be undermined by a non-compliant carrier, Teleworks exclusively uses SIP providers that have proven to be STIR/SHAKEN compliant. As of 09/2021, Bandwidth.com is the sole SIP provider used for outbound (terminating) traffic. This ensures that all customers' traffic is signed and sent in compliance with STIR/SHAKEN.

IX. Traceback and Enforcement Cooperation

- Teleworks Communications is dedicated to assisting in combatting illegal or unwanted Robocall or fraudulent phone number use. We commit to reply with The Industry Traceback Group requests and will comply promptly within 24 hours with all regulatory authorities, including but not limited to, the FCC and law enforcement to investigate any and all claims of fraudulent use.

