

TeldeInort Communication LLC

Robocall Mitigation Plan

STIR/SHAKEN Implementation Status

Teldelnort Communications LLC is a small voice service provider as per 47 CFR § 64.6304 (a).(2)[1] and is therefore exempted from requirements of 47 CFR § 64.6301 - "Caller ID authentication.(a)STIR/SHAKEN implementation by voice service providers." [2] through June 30, 2023, per 47 CFR § 64.6304 (a).(1)[3]

Robocall Mitigation Program

As per 47 CFR § 64.6305 - Robocall mitigation and certification.(a) Robocall mitigation program (RMP) requirements[4] are:

1. To take reasonable steps to avoid originating robocall traffic.
2. To commit to responding to a request from the Industry Traceback Group to investigate suspected robocalls.
3. To cooperate in investigating and stopping any illegal robocallers.

Therefore, Teldelnort Communications LLC in order to comply with FCC regulations and to continue fighting Illegal Robocalls has implemented the following Robocall Mitigation Program.

- Fraud detection implemented on IP network where possible
- Implement call blocking when suspicious activity detected
- Network and SIP traffic monitoring

Steps to avoid originating robocall traffic

As part of the Robocall Mitigation Program, Teldelnort Communications LLC has implemented several measures to prevent Illegal Robocalls from originating from its customers and network.

- **Know your Customers**
Teldelnort Communications LLC Customers are businesses that must sign a Master Services Agreement and agree to the Services Terms and Conditions[5]. By doing so, they must provide their physical location and contact person(s) and a representative signing the MSA.
Teldelnort Communications' turn-up process include helping customers improve their communications solutions, which leads to Teldelnort Communications LLC being aware of Customer's size and requirements.
- **Contractual agreements**
Teldelnort Communications LLC has included clear language in its Terms and Conditions that would mitigate the generation of illegal robocall traffic origination.
- **Analyze and Monitor Network Traffic**
Teldelnort Communications LLC continuously monitors traffic and blocks suspected

unlawful or fraudulent traffic.

- **Investigate and Mitigate Suspicious Calls and Calling Patterns**

Teldelnort Communications LLC mitigates suspicious calls by analyzing the usage patterns and limiting the number of concurrent channels based on the customer's size and usage on a per-customer basis. Thresholds are constantly monitored and adjusted to help better detect suspicious usage patterns such as those associated with short calling, illegal robocall, and toll fraud.