

Esotech Inc

Robocall Mitigation Plan (RMP)

Effective: Apr 5, 2024

Stir/Shaken Implementation Status

As indicated in the FCC's Robocall Mitigation Database, Esotech's telco is Telnyx which is fully compliant with STIR/SHAKEN.

According to the Telnyx website "[Telnyx has] been approved by the STI-PA to participate in the SHAKEN/STIR framework and are fully SHAKEN/STIR compliant. Today, Telnyx authenticates every outbound call with a valid U.S. Caller ID that originates on the Telnyx platform and is abiding by the attestation levels listed above. We are also passing on SHAKEN/STIR headers of customers who have their own authorization tokens along the PSTN. Inbound calls with A attestation and a valid token will now have the 'verstat' parameter added to P-Asserted-Identity headers."¹

FTC Telemarketing Sales Rule

Esotech abides by the FTC Telemarketing sales rules and the amended rule Telemarketing and Consumer Fraud and Abuse Protection Act (TCFPA) to combat telemarketing fraud. An example of the key provisions utilized by Esotech are:²

- prohibit misrepresentations
- limit when telemarketers may call consumers
- require transmission of Caller ID information
- prohibit abandoned outbound calls, subject to a safe harbor

¹ Stir/Shaken with Telnyx
(<https://support.telnyx.com/en/articles/5402969-stir-shaken-with-telnyx>)

² Complying with the Telemarketing Sales Rule
(<https://www.ftc.gov/business-guidance/resources/complying-telemarketing-sales-rule>)

Dialer Configurations

Contracted clients utilizing Esotech's TLDCRM are required to adhere to and acknowledge the dialing regulations prior to utilizing the system. These include:

- Inbound Accounts
 - Predictive / Power Dialing ratios are not to exceed 3, and dependent on Total Users Dialing and total users on the account may be required to migrate to a separate account for stability and liability.
- Outbound Accounts
 - Max Ratio of 6
- Outbound Connectivity and Performance
 - Clients must purchase enough DID's to support User Count x Max Ratio Dialing.
 - Clients are encouraged to use OutboundANI
 - Any changes to Max Users Dialing or Ratio should be consulted first with TLD / OutboundANI to purchase the required DID's to improve connectivity.
 - Attempts to increase ratio and users without sufficient DID's may result in DID's getting blocked and reducing performance. Clients are requested to seek consultation before increasing User count significantly or adjusting ratio will impact performance.
 - Clients are required to acknowledge that Esotech (TLD) is not liable for any issues caused by such modification.
- Outbound dials may not be done via non-TLD Account owned numbers. (Spoofing)

Traceback Requests.

Esotech Inc. will respond to all traceback requests from the FCC, law enforcement, the registered traceback consortium in investigating any stopping any illegal Robocall activity utilizing the TLDCRM.