



TELEPHONETIC

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RMD File Number RMD0007553

ROBOCALL MITIGATION PLAN

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Telephonetic LLC is a provider of IP voice and messaging communication services to entities in the United States. committed to complying with the STIR/SHAKEN framework mandated by the Federal Communications Commission (FCC) to reduce the number of fraudulent calls and robocalls made over IP networks. Telephonetic LLC certifies that all of the calls that it originates on its network are subject to the robocall mitigation guidelines explained further below, consistent with 47 CFR § 64.6305(a), which includes reasonable steps to avoid originating illegal robocall traffic and includes a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Telephonetic utilizes systems which are end-to-end compliant and able to provide safe attestation levels for any calls originating in its systems. It selects upstream carriers who are approved by the STI-PA to participate in the SHAKEN/ STIR framework and are fully SHAKEN/STIR compliant and authenticate every outbound call with a valid U.S. Caller ID that originates on our platform.

Telephonetic LLC certifies that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission, and that it has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with 47 CFR § 64.6301(a)(1) and (2).

Telephonetic achieve Robocall Mitigation compliance by following the guidelines listed below:

1. Customer Verification, Vetting and Onboarding

- a. Every customer is verified as a legitimate entity which must include at least three of the following:
 - i. Federal Tax registration (EIN or principal's Tax ID) allowing only legal U.S. Entities in our system.
 - ii. Active state registration and/or incorporation (Secretary of State, Sales Tax Registration, dba)
 - iii. Physical U.S. business location. P.O. Box is only accepted for billing purposes, but not as sole location information.
 - iv. Active Internet Domain registration.

- v. Active DNS Records which include one of the following: valid MX, SPF, DKIM records.
- vi. Main contact e-mail address associated with the Domain. Free email addresses are not accepted for communication.
- vii. Business Checking Account and/or Credit Card.

2. Account set up

- a. Every account in the phone system is created and provisioned internally after customer verification. Call distribution in and out of the system is created and assigned by our internal team.
- b. Customers are not able to set up any aspects of the trunk, caller ID, call routing, dialing plans, or assertion levels.
- c. Number porting to our system is required to have full control of IP voice network traffic.

3. STIR/SHAKEN Compliant Upstream Provider(s)

a. Telnyx

- i. Telnyx is fully compliant with STIR/SHAKEN and all calls originating on its network receive attestation. Telnyx has been approved by the STI-PA to participate in the SHAKEN/ STIR framework and are fully SHAKEN/STIR compliant, authenticating every outbound call with a valid U.S. Caller ID that originates on the Telnyx platform.
- ii. Telnyx passes on SHAKEN/STIR headers of customers who have their authorization toKENS along the PSTN. Inbound calls with A attestation and a valid token have the 'verstat' parameter added to P-Asserted-Identity headers.
- iii. The verstat parameter is included in the P-Asserted-Identity SIP header and includes information about the caller identity validation and attestation level.
- iv. Telnyx has introduced the following two additional values to the verstat parameter in SIP headers to improve the SHAKEN/STIR framework, providing us with more granular information regarding originating Caller ID attestation and verification results.
 - 1. TN-Validation-Passed-B: Identity header verification is successful, and the caller has a B attestation
 - 2. TN-Validation-Passed-C: Identity header verification is successful, and the caller has a C attestation
- v. No calls originate using numbers not purchased from us, ported to us, or verified through us and whitelisted in the provider's system.

- vi. Calls originating in our system receive a Full Attestation (Level A) for numbers purchased from Telnyx, and Partial Attestation (level B) for numbers ported to Telnyx.
- vii. Telnyx LLC is an authorized-service-provider-of “iConnectiv Authenticate”, which combines a trusted Caller ID authentication process along with an automated traceback capability. These processes verify the accuracy of the calling number information to help identify and stop robocalls, illegal calls and spoofing.
- viii. Voice data utilizes SRTP (Secure Real-Time Transport Protocol) to provide encryption, message authentication and integrity, and replay attack protection to the RTP data.

4. IP PBX and VoIP Clients

a. Incoming Calls

- i. We use Vodia and 3CX IP PBX hosted in secure firewall protected servers. These IP PBX offer advanced filtering, including anonymous call detection, authentication failure protection, and IP blacklisting for unrecognized agents that fail to authenticate.
- ii. We map STIR/SHAKEN attestation values from Telnyx LLC to SPAM scores in the PBX.
- iii. Incoming calls are spam scored by TrueCNAM, a SPAM scoring feature. Calls with high SPAM score are delivered to a SPAM mailbox that the customer can monitor or disregarded if requested by the end user.

b. Outgoing Calls

- i. All supported dialing methods require explicit human intervention to initiate calls.
- ii. Calls are limited to U.S. numbers, unless the customer has requested a call plan to specific countries, after verification of need.
- iii. All calls initiate at the provider using only provider approved numbers.

c. Call Analytics Systems

- i. Calls with short duration are monitored, notified, and reported by the service provider when a predetermined ratio/threshold is reached.
- ii. Call logs are regularly analyzed for anomalies for every account: unusual number of short calls, unusual call volume, unusual time of calling. Whenever an anomaly is detected, the end user is notified and is required to provide written explanation.

d. VoIP Devices and Endpoints Security

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- i. TLS wherever possible to secure communication with the PBX.
- ii. All outgoing calls are originated at the PBX, not at the endpoint. IP Voice endpoints communicates only through an SBC.

5. Upstream Carrier Information

a. Telnyx LLC

- i. **Address:** 515 N State St, Chicago, IL 60654
- ii. **Phone:** +1 (888) 980-9750.
- iii. **Email:** regulatory@telnyx.com
- iv. **FCC Credentials:** Telnyx LLC complies with all STIR/SHAKEN framework requirements and maintains a robust robocall mitigation process.

6. Contact Information

- a. For any inquiries or to submit Industry Traceback Consortium/TRACE Act-related requests, please contact:

Willy Salcedo

President, Telephonic LLC

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