

Robocall Mitigation Plan

This document details the TeleSpace Robocall Mitigation Plan.

The following policies apply to all customers and/or prospective customers of TeleSpace LLC and comprise our Robocall Mitigation Plan to avoid originating illegal robocall traffic from our network pursuant to the provisions of 47 C.F.R. § 64.6305(a) and 47 CFR § 64.6301(a)(1) and (2), adopted by the Federal Communications Commission (FCC) which require all “voice service providers” to establish a “robocall mitigation plan”. This document sets forth TeleSpace’s current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. TeleSpace views these policies and procedures as constituting “reasonable steps” to avoid the origination of illegal robocalls on its network and in addition to the following these steps TeleSpace commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

STIR/SHAKEN Implementation Status: As indicated in the FCC’s Robocall Mitigation Database, the Provider’s status with respect to STIR/SHAKEN implementation is as follows:

TeleSpace is a Voice Service Provider with a STIR/SHAKEN implementation obligation serving end-users.

TeleSpace has implemented STIR/SHAKEN authentication framework on its network and all calls originating on its network are subject to the policies and procedures set forth in this Robocall Mitigation Plan which are intended to stop anyone from using the Provider’s service to originate illegal robocalls.

TeleSpace has not been in the last two years, a subject to a Commission or other law enforcement agency action or investigation due to suspected involvement with illegal robocalling or spoofing.

Contract Requirement and Customer Vetting: Our agreement clearly prohibits passing illegal robocalls through any of our switches or networks and defines precise requirements for ASR and other traffic statistics. Customers who violate these rules are subject to immediate termination without notification. If TeleSpace believes illegal traffic has been passed through its network, the customer sending such traffic forfeits confidentiality and all data will be shared with industry partners and law enforcement as required by regulatory bodies.

Customer Disclosures and Confirmation: All customers are required to disclose certain information about their business such as physical location, contact personnel, state/country of incorporation or business formation, federal tax I.D. or non-USA government ID They must also disclose the practices and nature of their business. We endeavor to know the precise type of traffic which originates from each customer’s switch including the type of customers they acquire and exact type of services they provide. TeleSpace investigates each Customer’s claims to verify accuracy before accepting them as a customer.

Monitoring and Traceback: TeleSpace monitors its system diligently and will investigate any suspicious traffic. TeleSpace acts promptly when we detect traffic which appears to be robocall activity to ensure it has been pre-authorized as “legal” (ie: authorized political, non-profit, reverse 911 or fully-opted-in traffic). In the event TeleSpace receives a Traceback request for an illegal robocall, we act on it immediately, request a specific and detailed explanation from our customer(s) and insist on immediate corrective action. TeleSpace timely responds to all Traceback requests from authorities. If correct action is not timely provided by our customer, TeleSpace takes whatever action is necessary to prevent recurrence of the event(s). Within **Appendix A** to this Plan, TeleSpace identifies a single point of contact for receiving all traceback requests.

Publication and Notification: TeleSpace publishes in the public section of its website this Robocall Mitigation Plan and further proactively notifies all customers of such policy along with keeping record of such notifications.

Call Blocking: TeleSpace blocks all calls originating from numbers known to us to send illegal robocall traffic and/or calls destined to specific phone numbers as appropriate for robocall mitigation.

Law Enforcement Cooperation: TeleSpace cooperates fully with investigative authorities, industry traceback groups, the FCC and the official consortium designated to lead private traceback efforts. We have a single contact individual designated to handle all traceback requests and coordinate with outside investigations.

Third Party Analytics: TeleSpace also uses third-party call analytics to further assist and prevent the origination of illegal robocalls on its network. Included in **Appendix A** is the name of the vendor(s) used along with a description of the call analytics system(s) used to identify and block illegal robocall traffic.

Upstream Providers: TeleSpace has longstanding relationships with our upstream providers and maintains its awareness of the nature of their businesses. TeleSpace, in the interest of providing the highest quality services to all its voice service customers, is committed to taking those steps necessary to ensure that any upstream providers providing connectivity are equally committed to monitoring their networks and preventing their use for the transmission of illegal robocalls. This includes the use of robocall prevention language in any contracts that TeleSpace may directly have with any upstream provider entities. Included as part of **Appendix A** to this Robocall Mitigation Plan document is a list of the Provider’s current “Upstream Provider(s)” along with contact information for each.

Appendix A

Traceback Request Single Point of Contact:

Name: Danny Rettele

Title: VP Network Operations and Engineering

Phone Number: 512-814-1703

Email Address: danny.rettele@telespace.com

Upstream Provider Information:

Name of Upstream Provider: Telnyx

Nature of Business: SIP Carrier

Address: 205 N Michigan Ave, Suite 810, Chicago, IL 60601

Name of Contact: Mark Morse

Title: CEO

Phone Number: 888-980-9750

Email Address: support@telnyx.com

Name of Upstream Provider: Bandwidth

Nature of Business: SIP Carrier

Address: 2230 Bandmate Way, Raleigh, NC 27607

Name of Contact: Caitlyn Perry

Title: Lead Development Representative II

Phone Number: 855-864-7776

Email Address: cperry@bandwidth.com

Call Analytics Vendor Name and Description of System:

Name of Vendor: TransNexus

Description of the call analytics system

TeleSpace LLC utilizes a third-party "Analytics" platform provided by TransNexus to support the effectiveness of our Robocall Mitigation Plan. This includes, as examples, the use of "Robocall and Telephone Denial of Service (TDos) Prevention" services and "Telecom Fraud Prevention", which include more specifically the use of the following methods/tools as a means of preventing and blocking fraudulent and illegal robocalls on its network: the use of CDRs and related reports for determining mitigation actions; use of SIP Analytics enabling real time traffic analysis and detection and mitigation of robocalls at origination; use of blacklisting and whitelisting to mitigate calls with specific attributes; use of CAPTCHA gateway services to distinguish whether calls are from humans or autodialers; use of a "Shield" database that screens calls at origination for calling numbers that are invalid, high-risk, or appear on "Do Not Originate" lists; and use of reputation look up services on calling numbers at origination.