

Tel-Systems Inc.

1080 Tapscott Road, Unit 1
Scarborough, Ontario
Canada M1X-1E7
Phone: 1-416-291-6000 Fax: 1-416-291-6010
Email: info@tel-systems.com

Feb 21, 2022***Via Upload to FCC Robocall Mitigation Database***

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Robocalling Mitigation Policy

As required by the FCC, Tel-Systems Inc. hereby submits the following Robocall Mitigation Plan for compliance with the TRACED Act. This mitigation plan has been implemented to ensure that robocall and other illegal traffic does not originate on Tel-Systems Voice Network.

Tel-Systems Inc. provides VoIP services to businesses in Canada and some in the United States of America. Tel-Systems provides far less than 100,000 Subscriber lines and therefore are not currently required to implement a STIR/SHAKEN solution until June 30th, 2023. Our underlying carrier however have a STIR/SHAKEN solution with Authentication in place.

Tel-Systems Certification Option 2: Partial STIR/SHAKEN Implementation

Performing Robocall Mitigation through our Carrier Thinktel (Distributel). Tel-Systems Inc. certifies that it commits to respond 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, and that some of the voice traffic that originates on its network is authenticated with STIR/SHAKEN, and the remainder of the voice traffic that originates on its network is subject to a robocall mitigation program. Tel-Systems Inc. also certifies that the attached searchable PDF details the specific reasonable steps it has taken to avoid originating illegal robocall traffic as part of its robocall mitigation program, and, if applicable, the type of extension or extensions it received under 47 CFR § 64.6304.

Efforts To Mitigate Robocalls and other illegal calls from originating on our Voice Network.**1. Prohibition of Abusive Calling and Unlawful Calling**

Tel-Systems Inc. prohibits the use of its services that would infringe upon any law in its: Terms of Service Agreement ("ToS"). In this agreement the "End User agrees that Tel-Systems Inc. service plans do not allow any device other than a natural person the right to use this service for auto-dialing, continuous or extensive call forwarding, telemarketing (including without limitation charitable or political solicitation or polling), fax broadcasting, fax blasting. Under any circumstance the service shall not be used for any unlawful purpose or such service will be terminated immediately.

2. New Customer Screening and Service Limitation

New customers go through a methodical screening process to ensure that Tel-Systems Inc. can service the customers needs as well as take measures that ensure the customer will conform to the terms of the ToS agreement. Tel-Systems Inc. limits the concurrent call capacity of all its customers to a number of subscribers the customer had contracted for. All SIP trunk customers have both limits on call concurrency as well as calls per second.

We also limit our total outbound Trunk Service Capacity as well and this can be changed on the fly. We limit our traffic on a daily basis depending on past history which allows us to throttle only what we need on a per day basis.

All our customers own their DID's and are assigned only DID's they own. Our Customers can only use DID's that they own. We also control and monitor the CallerID the customers can use and we make sure we assign a valid CallerID which the customer owns. We also have a Setting in our Switch that forces this Feature called "only make outbound calls within DID range". So our switch will look to make sure the call is using their DID number only or it will not allow the call.

3. Our 24/7 Monitoring and Reporting Features

Our customers all have reporting enabled so we can monitor call patterns with time, duration and date stamped. These reports are saved and backed up for 3 months so we can go back and retrace the calls 3 months prior. These reports are at a System Level as well as at a Customer Level.

4. End User Call Traffic and Monitoring

Tel-Systems Inc.'s underlying Carriers monitor all traffic 24 / 7. The underlying carriers look at overall volume, daily and weekly trend analysis, traffic pumping metrics and theft of service metrics. The underlying carriers utilize both international and domestic fraud protection services that automatically look for Robocalling and fraud patterns, then automatically block all outbound calls from any telephone number that crosses the predefined threshold.

Our Switch limits calling to only go through our Provider Thinktel which has STIR/SHAKEN implementation for our voice traffic and signs calls.

5. Traceback and Enforcement Cooperation

Tel-Systems Inc. will cooperate fully with the traceback community including the FCC, State attorneys general, law enforcement officials and the Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Additionally, Tel-Systems Inc. will diligently assist and restore service to any customer who claims their calls were blocked as a result of this monitoring for invalid reasons.

Traceback Contacts:

Contact: Joseph Iannazzo
Email: joe@tel-systems.com
Phone: 1-416-291-6000 Ext 103

Contact: Mike Iannazzo
Email: mike@tel-systems.com
Phone: 1-416-291-6000 Ext 111

Sincerely,

A handwritten signature in black ink that reads "MIannazzo". The signature is stylized with a large, cursive 'M' and a more formal, slightly italicized 'Iannazzo'.

Mike Iannazzo
President