

Talton Communications, Inc.
Robocall Mitigation Plan
V.2 February 2024

STIR/SHAKEN IMPLEMENTATION

Talton Communications, Inc. (“Talton” or “Company”) provides incarcerated people’s communications services (“IPCS”) to correctional facilities throughout the United States. These services allow the incarcerated to initiate voice calls to their friends and families outside the correctional facility. Talton’s voice calling services are outgoing only; the incarcerated are not permitted to receive incoming voice calls.

Talton is a small voice service provider (“VSP”) that does not control the network infrastructure necessary to implement the STIR/SHAKEN technology. The Company’s underlying provider, Global Tel*Link Corporation d/b/a ViaPath Technologies (“ViaPath”) has contracted with underlying third-party providers to originate, transmit, and terminate calls initiated by incarcerated people. The Company has implemented a Robocall Mitigation Program (“RMP”) to include the obligations outlined in the Commission’s recent release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023). In compliance with the Report & Order, Talton Communications submits this RMP and certification.

ROBOCALL MITIGATION

Background

The FCC Order requires that a RMP include the following affirmative obligations for voice service providers:

- Outline reasonable steps VSP has taken to effectively mitigate illegal robocall traffic;
- Commitment to respond 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;
- Know Your Customer procedures;
- Describe any call analytics system used to identify and block illegal traffic

Talton’s system and services allow inmates to remain in contact with family, friends and other associates while still providing facility administrators with the necessary control over inmate communications. The system utilizes IP-enabled technology by routing the calls over the existing broadband carrier’s facilities that currently serve the confinement facility. There are no wireline facilities used in the delivery of services, and the system only allows OUTGOING calls. Incarcerated individuals are not permitted to receive incoming calls. Talton’s system is designed so that calls are completed only to those called parties who specifically accept the charges for a call. Equipment utilized by Talton requires a positive response from the called party before the connection is established and billing can begin.

Talton is a reseller and does not control the network infrastructure necessary to implement STIR/SHAKEN. Talton contracts with their underlying provider, ViaPath, to originate, transmit, and terminate inmate-initiated calls, as well as obtain telephone numbers on Talton’s behalf.

Due to the specialized nature of Talton's services, it is highly unlikely that illegal robocall traffic could be originated via Talton's inmate calling services system. Talton works closely with ViaPath to prevent, detect, and mitigate the delivery of illegal robocall traffic.

EXTENSION

Talton is subject to an extension of the STIR/SHAKEN implementation requirements under FCC Rule 47 §64.6304(b) as a voice service provider that is "incapable of obtaining a [Service Provider Code] token due to Governance Authority policy." Under the rule, the extension remains in place until Talton is "capable of obtaining an [Service Provider Code] token."

Under the current Service Provider Code ("SPC") Token Policy issued by the Secure Telephone Identity Governance Authority in May 2021, a provider must have the following to receive a SPC token: (1) certification on file with the FCC regarding the provider's status of implementing STIR/SHAKEN, (2) an Operating Company Number ("OCN"), and (3) FCC Form 499-A report on file. Talton does not meet the requirements to obtain an OCN with NECA, and thus does not meet the requirements to receive an SPC token under the current SPC Token Policy.

Traceback:

Talton commits to respond to traceback requests received from the Industry Traceback Group, the FCC, or law enforcement within twenty-four (24) hours as required under FCC rules.

Traceback Contact Information

Name	Title	Contact Information
Robin Howell	VP Program Management	robin@talton.com

Talton will also cooperate fully with its underlying provider, ViaPath, to cooperate with state and federal regulators to prevent, detect, and mitigate illegal robocalls as applicable.

Call Blocking:

The system is not designed to accept inbound calls. As a result, there is no requirement to monitor the RMD to identify calls coming from companies not registered in the Robocall Mitigation Database. For outbound calls, if an inmate makes a call to a party who no longer wants to receive calls from that inmate, the number can be added to a block list at the called party's request.

Telephone Number Authorization:

Talton works with their underlying provider to secure the required telephone numbers on Talton's behalf.

CONCLUSION

The Company submits this Robocall Mitigation Program to comply with the Federal Communications Commission's Sixth Report and Order (FCC 20-187). Talton agrees to update its submission within 10 business days of any change to the information in the RMD, including its Robocall Mitigation Program.