

Robocall Mitigation Program Description

Priority Communications Services LLC d/b/a Telecloud
425 Old Newman Rd #202
Frisco, TX 75036
FRN: 0030264329
February 2026

I. Company Overview

Priority Communications Services LLC, a Texas limited liability company d/b/a Telecloud (“PCS” or “the Company”) is a Texas-based provider of business telecommunications services operating since 2017. PCS provides hosted PBX services utilizing 3CX software and resells SIP trunking services to commercial end-user customers.

PCS serves business customers only and does not provide residential consumer voice services.

II. Regulatory Status

PCS is a domestic Voice Service Provider as defined by 47 CFR § 64.6300 et seq.

PCS does not directly originate calls to the Public Switched Telephone Network (PSTN). All outbound PSTN traffic is transmitted through upstream wholesale SIP providers, including Skyetel, that are responsible for call authentication and STIR/SHAKEN implementation at the network origination point.

PCS does not operate as a Gateway Provider or Non-Gateway Intermediate Provider.

PCS is not a Foreign Voice Service Provider.

III. STIR/SHAKEN Implementation Status

PCS does not directly implement the STIR/SHAKEN authentication framework because:

1. PCS does not directly originate calls to the PSTN.
2. PCS does not control the final SIP boundary where authentication headers are applied.
3. Upstream carriers are responsible for STIR/SHAKEN attestation and authentication.
4. PCS does not possess independent attestation authority at the originating network level.

Accordingly, PCS operates under a robocall mitigation program consistent with 47 CFR § 64.6305(d) and certifies that it has implemented reasonable and effective measures to prevent the origination of illegal robocalls.

IV. Robocall Mitigation Practices

PCS has implemented the following measures to prevent illegal robocall traffic from originating on its network:

- Business-only verified commercial customers
- Customer identity verification and caller ID validation prior to activation
- Prohibition of spoofing and unauthorized caller ID use
- No auto-dialers or automated call generation permitted
- Whitelisted IP authentication controls
- Traffic monitoring and anomaly detection
- Cooperation with upstream SIP provider spam analytics
- Refusal of traffic from providers not listed in the FCC Robocall Mitigation Database or identified as de-listed providers.
- Maintenance of a reasonable Do-Not-Originate (DNO) list consistent with 47 C.F.R. § 64.1200.
- Know Your Customer (KYC). PCS verifies business identity, service location, principal ownership (where applicable), and validates customer authority to use requested telephone numbers prior to activation.

V. Traceback Cooperation

PCS fully cooperates with the Industry Traceback Group (ITG), USTelecom, the Federal Communications Commission (FCC), and law enforcement agencies.

PCS commits to:

- Respond fully and completely to traceback requests
- Provide requested call detail records
- Respond within 24 hours of receipt of any traceback request
- Identify originating customers associated with suspicious traffic
- Take corrective or enforcement action as necessary

VI. Call Detail Record Retention

PCS retains call detail records (CDRs) sufficient to identify originating customer, calling number, called number, date and time of call, call duration, and source IP address where applicable.

CDRs are retained for a minimum of twelve (12) months and are made available upon lawful request by authorized regulatory or law enforcement authorities. PCS maintains such records in a manner sufficient to respond to traceback inquiries and regulatory requests.

VII. Enforcement & Remediation Policy

If PCS identifies or is notified of suspected illegal robocall activity:

1. The customer account is immediately reviewed.
2. Traffic may be suspended pending investigation.
3. Customers must provide justification and documentation.
4. Confirmed violations result in service suspension or permanent termination.
5. PCS may report unlawful activity to appropriate authorities.

PCS maintains a zero-tolerance policy for illegal robocalling.

VIII. Government Actions or Investigations

PCS has not been the subject of any formal Commission, law enforcement, or regulatory agency action or investigation relating to illegal robocalling, spoofing, or deficient robocall mitigation practices within the prior two years.

IX. Compliance Statement

This robocall mitigation program is implemented in accordance with 47 CFR § 64.6305(d). PCS certifies that it has implemented reasonable and effective measures to prevent the origination of illegal robocalls, cooperates fully with traceback efforts, maintains sufficient records, and enforces strict customer controls to prevent unlawful call activity.

PCS certifies that it has taken reasonable steps to prevent the origination and transmission of illegal robocalls and spoofed calls consistent with applicable FCC rules.

PCS will update this mitigation plan as necessary to remain compliant with evolving FCC requirements.

X. Designated Robocall Mitigation Contact

The designated robocall mitigation contact is listed in the FCC Robocall Mitigation Database filing and is responsible for responding to traceback requests, coordinating compliance matters, managing enforcement actions, and maintaining mitigation documentation.