

Robocall Mitigation Plan

Business Information

TCK Solutions LLC
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Honolulu, HI 96814

Robocall Contact

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Overview

In the Commission's 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) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that an RMP must include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

TCK Solutions LLC ("TCK") is a small voice service provider ("VSP") that is dedicated to stopping illegal calls from originating on and passing through our network. This document delineates TCK's RMP.

Know Your Upstream Provider

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51, TCK provides the following information concerning its upstream voice service carrier:

Twilio Inc.
101 Spear Street
Ste 500
San Francisco, CA 94105
Amy Holcroft
(415) 295-4909
aholcroft@twilio.com

TCK has a master service agreement with its above-referenced carrier and has received assurances that it has, and will continue to, sign calls transmitted to TCK and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to TCK. TCK and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customers ("KYC")

Before TCK provides voice service, we require each customer to provide their legal business name and address and registered owners/officers, along with proof of good standing in the applicable state's corporations database. Additionally, each customer must provide a primary point of contact and current phone number.

Analytics for Monitoring Traffic

TCK works with its upstream carrier to analyze high-volume voice traffic to identify and monitor patterns consistent with robocalls. We look for calling patterns with unusual spikes, traffic patterns, or attempted use of non-validated ANIs to detect patterns consistent with illegal robocalls.

If TCK detects a calling pattern consistent with illegal robocalls, we will identify the party that is using our network to originate those calls and will take appropriate action. Taking appropriate action may include, but is not limited to, initiating a traceback investigation, verifying that the originating subscriber owns or is authorized to use the Caller ID number, and suspending or terminating the party's ability to originate calls on our network.

TCK does not use any third-party vendors in deploying our analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, TCK works with our upstream carrier to follow the defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his or her particular use case and validate that the activity belongs to that subscriber.

TCK follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses. TCK devotes significant resources to provide prompt and complete resources to traceback requests. TCK certifies that it will comply with traceback requests within 24 hours of receiving same.

Blocking

TCK will implement Do Not Originate requests it receives from the ITG. TCK and its upstream carrier have mechanisms to automatically block suspicious calls using internal analytics. If those monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, TCK will take appropriate action which may include suspending or terminating the subscriber's use of TCK's network. TCK will cooperate with Investigative Bodies to address traceback requests from law enforcement (including state attorneys general offices), to the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. TCK will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapt to this ever-changing issue. In the event of any material change to this plan, TCK will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Edmund Cotta

I, Edmund Cotta, Owner of TCK Solutions LLC ("TCK"), do hereby certify, under penalty of perjury, the following:

- TCK's business name and primary address are as follows:

TCK Solutions LLC
1050 Queen St. Suite 100
Honolulu, HI 96814

- TCK does not have any other business names.
- TCK has not previously used any other business name.
- The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- The following persons/entities own 10% of or more of TCK: Edmund Cotta
- TCK's sole principal is Edmund Cotta, Owner.
- TCK has no affiliates or subsidiaries.
- Neither TCK nor Edmund Cotta has had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- TCK's role in the call chain is that of a voice service provider that does not have a STIR/SHAKEN implementation obligation serving end-users. TCK lacks access to the infrastructure necessary to implement STIR/SHAKEN.
- TCK has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- TCK is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- TCK is not required to, nor does it have, an Operating Company Number.



Edmund Cotta