

Robocall Mitigation Program for TCRO Systems, LLC

1. Company Overview

- **Company Name:** TCRO Systems, LLC
 - **Type of Business:** SaaS provider
 - **Services Offered:** We offer a CRM for the credit remediation industry and lending partners who subscribe to our machine learning/AI solutions for identifying errors in credit reports.
 - **Compliance Statement:** TCRO Systems, LLC is committed to compliance with the FCC's STIR/SHAKEN regulations, despite not offering voice calling services to external users. This program outlines the steps we take to mitigate robocalls and ensure our internal communication practices are compliant.
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2. Mitigation Program Statement

- **Voice Communication Usage:** TCRO Systems, LLC does not provide any voice calling or voice-related services to end-users. All of our communications are internal and do not involve the transmission of calls to or from other carriers or third parties.
 - **STIR/SHAKEN Compliance:** Although we do not originate or terminate voice calls for external parties, we ensure that any internal calling system (if applicable) adheres to best practices as outlined in the STIR/SHAKEN framework to prevent accidental involvement in robocalling activities. This includes ensuring proper call authentication measures within our internal systems.
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3. Certification and Information

- **STIR/SHAKEN Authentication:** Since we do not provide external calling services, we do not directly participate in the STIR/SHAKEN framework, but we maintain a robust internal system that ensures our calls (if made) comply with applicable authentication and verification rules as a good-faith measure. Any third-party services used for outbound calls (e.g., customer service) are selected based on their compliance with STIR/SHAKEN.
 - **Compliance with the Robocall Mitigation Program:** While we do not provide external calling services, our policies ensure that our internal telephony systems (if applicable) do not inadvertently generate robocalls or allow for unauthorized or fraudulent use.
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4. Call Blocking

- **Internal Call Blocking Procedures:** We do not engage in any calling services that involve third-party customers or clients, so call blocking for external robocalls is not applicable to

our services. However, we take steps to ensure that all internal calls, if made, are compliant with the highest industry standards to avoid any mistaken classification as robocalls.

5. Call Traceability and Reporting

- **Record Keeping and Auditing:** TCRO Systems, LLC keeps accurate records of any internal communications systems and their usage. These records are available for review should any incident occur that requires investigation. We are committed to maintaining a secure, fraud-free environment for all communications that occur within our systems.
 - **Response to Violations:** While we are not directly involved in robocalling, we take immediate action if any of our communications systems are suspected of being used for unlawful robocalling activities. We will cooperate fully with relevant authorities to address the issue if one arises, despite not originating external calls.
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6. Third-Party Services

- **Vetting and Compliance:** If any third-party service is used in the process of communication, TCRO Systems, LLC ensures that these vendors adhere to all necessary FCC rules, including the STIR/SHAKEN framework. These vendors are required to certify their compliance with relevant robocall mitigation practices.
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7. Employee Training

- **Robocall Mitigation Awareness:** All employees involved with communication infrastructure or customer relations are trained on the legal implications of robocalling and the importance of following FCC regulations. We also educate employees on identifying and reporting any misuse of internal telephony services.
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8. Contact Information

- **Program Administrator:** Clint Lotz
 - **Email:** clint@trackstar.ai
 - **Phone:** 480-535-5640
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9. Certification

- TCRO Systems, LLC certifies that this program has been implemented in full accordance with the FCC's rules and guidelines for robocall mitigation, and that no part of our

operations involves external call origination or termination services that would require STIR/SHAKEN certification.