



Robocall Mitigation Plan

Business Information

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About

The4th Tech Solutions LLC is a IT consulting company that operates in Tulsa, OK. Our IT services include Network systems, Computing systems, Software appliciations, video surveliance, access control, and voice applicatations. The4th is a botique based provider that specilizes in providing high availability solutions for small and medium businesses within our service area.

Please note that The4th Tech Solutions has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action as well as VoIP.ms is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

Vetting Process

The4th offers a turn key completely managed solution for our clinets. With a few exceptions of controlling calling features, The4th Tech Solutions manages all points of our clinets voice services. We provide the phones, program all call routing, and maintain relatationships with upstream carriers on behalf of our clinets.

The4th does not allow auto dialing software. Any telemarketing activities performed by end users are the result of them physically entering a TN into the phone.
Customer agrees to set a valid CallerID/ANI Identification.

The4th Tech Solutions, LLC is dedicated to stopping illegal calls from originating in our system and monitoring the calls coming into our system.



Know Your Customer ("KYC")

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated that subscriber. A subscriber is an entity that has a business relationship with The4th in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

The4th's KYC program involves obtaining specific information from its subscribers. This process includes collecting such information such as:

Physical business location;
Contact person(s); and
Nature of customer's business.
Agreement with our Acceptable Use Policy ("AUP")

The4th maintains an AUP that subscribers must agree to before being permitted to use The4th's system. Among other things, the AUP prohibits:

providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call; violating any applicable local, state, or federal law; and
using The4th's service to engage in or in connection with fraudulent activities.

The4th's terms of service with subscribers specify that The4th may take action up to suspension or termination of service for violation of the AUP.

Lastly The4th maintains a personal relationship with all of our clients. As a boutique service provider, voice service is an add on service, and not a primary service. All of our subscribers are utilizing many other IT related services.

Monitoring

The4th works with its upstream carrier to analyze high-volume voice traffic in order to identify and monitor patterns consistent with robocalls. If The4th's partners detects a calling pattern consistent with illegal robocalls, we will identify the party and will 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 system.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, The4th follows 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.

The4th is familiar with and uses best efforts to follow the Industry Traceback Group (“ITG”)-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, The4th will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

Normal usage trends across a customer base are typically clear and predictable. At The4thTech Solutions, we depend on services our upstream vendors have implemented real-time alerts for deviations (think of an abnormal spike in the quantity of inbound calls, a sudden increase in international call attempts, etc.), allowing our team to investigate promptly.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. The4th 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, The4th 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.

Know Your Upstream Providers

The4th Tech Solutions LLC makes use of a selected number of carriers to route calls in United States, including:

Voip.ms 200-2480, boul. des Entreprises, Terrebonne, QC, Canada, J6X 4J8	Bandwidth.com 2230 Bandmate Way, Raleigh, North Carolina 27607
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Commitment

To the extent that The4th Tech Solutions LLC were to receive information from law enforcement, traceback entities or other sources that a customer is engaged in illegal robocalling, our policy is



to cooperate fully, including providing the identity of any suspected illegal robocaller, pursuant to legal service or process. Our internal policy is to reply to those requests within 24 hours.

The4th Tech Solutions LLC also follows the Industry Traceback Group recommended best industry practices and cooperates in traceback and trace forward investigations.

The4th Tech Solutions LLC offers a dedicated point of contact for any law enforcement requests:

cam+lawenforcement@the4th.us.

Law enforcement agencies can simply provide the following information and the request will be treated on a highly accelerated basis:

- Full name, Authorized Agency / Department,
- Phone Number,
- Nature of Request (Subscriber info, Call detail records, Billing info, etc.),
- Target Telephone Number(s),
- Request Start Date and End Date,
- Copy of the Subpoena, Court Order, Search Warrant, or Other Formal Legal Process, and
- Additional Notes (incl. specific circumstances and/or deadlines).

If there are multiple requests, we request to submit only one legal process per email to ensure proper treatment.

As far as our understanding goes, the FCC previously stated that a Robocall Mitigation Program is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegitimate traffic (including but not limited to illegal robocalls) and the Service Provider complies with the practices it describes in its filing. While The4th Tech Solutions fights illegitimate traffic (including but not limited to robocalls), it also fully commits to ensure compliance with this program and to keep on enhancing it. In the event of any material change to this plan, The4th Tech Solutions 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.