

TerraCom, Inc.
Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by TerraCom, Inc. (“TerraCom”) to mitigate and eliminate illegal robocalling. TerraCom has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

TerraCom provides retail wireless calling services, primarily to lifeline subscribers. All telecom services are provided on a resale-only basis. As a wireless reseller, TerraCom is dependent on our underlying provider’s assistance with monitoring their networks for fraudulent voice calling patterns. Our underlying providers are AT&T and T-Mobile.

Know Your Underlying Provider

TerraCom, Inc. has master service agreements with AT&T and T-Mobile and has received written assurances from their officials that it has and will continue to sign calls submitted to TerraCom, Inc. and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to TerraCom. TerraCom and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

TerraCom uses the lifeline application information provided to us and we also use a third party’s system to generate approved numbers. Once approved through the national verifier we approve the end user’s order. We use the name, physical address, contact information, and private information to vet the identity of our subscribers.

TerraCom screens all applicants to verify information about each subscriber. We monitor subscriber usage of programs and will refuse services to any customer that is using the service for illegal robocalling or other fraudulent call activity.

In our research of the prospect, TerraCom will not activate clients that provide anonymous information or where data mismatches are found.

Traceback Requests

TerraCom is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate

with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. TerraCom will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Tramell Johnson
Internal Audit and Compliance Manager
(405) 479-8934

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, TerraCom immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by TerraCom and/or obtained by TerraCom from TerraCom’s underlying carrier for use by the subscriber. Numbers can also be allocated by TerraCom or ported using information from previous bill matching customer information.

International Calling

TerraCom is not currently an international voice services provider. If at any time TerraCom does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

As a reseller, TerraCom must rely on our underlying provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices. TerraCom has features in place provided by vendors, including AT&T and T-Mobile. TerraCom monitors subscriber usage and the usage can also be used for call analytics.

Ongoing Robocall Mitigation

TerraCom monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our underlying provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. Our terms and conditions explain it is at our discretion to suspend or terminate service to a customer suspected of abusing generating illegal calls. Terms and conditions: <https://www.terracomwireless.com/terms>.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns.

TerraCom Contact for Robocall Mitigation-Related Issues

Please direct any questions related to Robocall Mitigation issues to:

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