

Robocall Mitigation Plan

TCB Technologies LLC

Purpose and Scope

This Robocall Mitigation Plan describes the policies, procedures, and technical controls implemented by TCB Technologies LLC to prevent the origination of illegal robocall traffic, in compliance with applicable Federal Communications Commission requirements. This plan applies to all voice services provided by TCB Technologies.

Know Your Customer (KYC)

TCB Technologies provides hosted VoIP services primarily to small and medium-sized businesses. Prior to service activation, TCB Technologies performs customer due diligence to verify identity, legitimacy, and intended use of service.

Customer identity verification includes confirmation of business name, physical address, responsible party, and contact information. Service use assessments review intended calling patterns and anticipated call volumes. Cost analysis and inventory reviews establish a baseline of expected traffic behavior. Network and infrastructure health checks ensure VoIP readiness and reduce the risk of misuse. All customers must execute a signed service agreement prior to service activation.

TCB Technologies does not provide wholesale voice services and does not permit international call origination.

Know Your Upstream Providers

All upstream voice service providers utilized by TCB Technologies are registered in the FCC Robocall Mitigation Database and have implemented STIR/SHAKEN authentication. Caller-ID ownership validation is required prior to activation.

Additional Technical Controls

TCB Technologies retains administrative control over the hosted PBX environment. Customers are not authorized to modify outbound caller-ID. Authorized caller-IDs are maintained in an internal database. All system modifications are logged and auditable.

Traffic Monitoring

Outbound calling activity is continuously monitored and baselined. Alerts are generated for unusual calling patterns including high call volume bursts, low call completion rates, short-duration calls, high numbers of unique called numbers, and evidence of systematic dialing. Suspicious traffic is investigated and unlawful robocalls are blocked. Service may be suspended or terminated if necessary.

STIR/SHAKEN Implementation

TCB Technologies began providing VoIP services in March 2023. STIR/SHAKEN is currently provided through upstream providers. Native STIR/SHAKEN implementation is actively underway.

Traceback and Enforcement Cooperation

TCB Technologies cooperates with traceback requests from the FCC, law enforcement, and the Industry Traceback Group. Prompt and complete responses are provided.

Certification

TCB Technologies will update its Robocall Mitigation Database certification within ten business days of any material change. A designated compliance officer is responsible for maintaining certification accuracy.