

ROBO MITIGATION PLAN

TECHCOM CONNECT, LLC

December 20, 2024

Federal Communications Commission (FCC) Enforcement Bureau 445 12th Street SW
Washington, DC 20554

Subject: Robocall Mitigation Plan Submission for Techcom Connect LLC

Dear Enforcement Bureau,

This letter serves as Techcom Connect LLC's comprehensive Robocall Mitigation Plan (RMP) to ensure full compliance with the Federal Communications Commission's (FCC) rules under 47 CFR § 64.6305. This plan outlines the measures we have implemented to prevent unlawful robocalls from originating on our network and the steps taken to address any deficiencies identified by the Enforcement Bureau. Our efforts align with the guidance provided in the FCC's Enforcement Bureau Order released on December 17, 2024.

Robocall Mitigation Strategy

1. Enhanced Customer Onboarding and Monitoring

Techcom Connect LLC has implemented a rigorous customer vetting process to prevent unlawful robocallers from accessing our network. This includes:

- Verifying customer identity through government-issued IDs, business licenses, and proof of operations.
- Conducting background checks for prior FCC enforcement actions or associations with illegal robocalling.
- Requiring customers to sign an attestation confirming compliance with FCC robocall and spoofing rules.

Additionally, ongoing monitoring of customer activity includes:

- Analyzing call traffic patterns to detect anomalies consistent with illegal robocall campaigns.
- Automatic flags for high call volumes with short-duration calls.

- Monthly audits of customer behavior and traffic.

2. Integration of Advanced Call Analytics

Techcom Connect LLC uses advanced third-party call analytics solutions and proprietary tools to detect and mitigate illegal robocalls. These measures include:

- Real-time blocking of known robocall patterns identified by analytics tools.
- Integration with industry databases such as the Traceback Group's platforms for active monitoring.
- Prompt responses to traceback requests from the FCC or other authorities, ensuring resolution within 24 hours.

3. Thorough Vetting of Upstream Providers

All upstream and interconnecting providers undergo a robust vetting process to ensure compliance with FCC rules. This process includes:

- Verifying that providers are listed in the Robocall Mitigation Database (RMD).
- Requiring contractual commitments to adhere to STIR/SHAKEN authentication and robocall mitigation standards.
- Conducting quarterly reviews to ensure ongoing compliance with FCC mandates.

4. STIR/SHAKEN Implementation

Techcom Connect LLC affirms that it has implemented the STIR/SHAKEN framework across its IP-based networks. For non-IP networks, alternate mitigation measures are deployed as required by 47 CFR § 64.6305, ensuring:

- All calls originating on non-IP networks are reviewed to prevent unlawful spoofing.
- Immediate updates to mitigation procedures as technology evolves.

5. Dedicated Compliance Team

Techcom Connect LLC maintains a dedicated compliance team responsible for:

- Immediate responses to FCC inquiries and traceback requests.
- Ensuring updates to RMD certifications are completed promptly and accurately.
- Providing internal training on FCC rules and robocall mitigation requirements.

Certification and Reporting

1. Updated Certification in RMD

Techcom Connect LLC's certification includes:

- A clear description of the Company's role in the call chain.
- Updated contact information for the compliance officer responsible for responding to inquiries.
- Affirmation of STIR/SHAKEN implementation and ongoing compliance.
- A commitment to respond to traceback requests within 24 hours.

2. Notification of Deficiency Resolution

Techcom Connect LLC will notify the FCC Enforcement Bureau at EnforcementBureauTCD@fcc.gov immediately upon resolution of any identified deficiencies. All updates will be reflected in the RMD by December 31, 2024.

3. Regular Review and Updates

Semi-annual reviews of the RMD certification are conducted to ensure continued compliance with evolving FCC rules. Updated certifications are submitted as required.

Mitigation of Deficiency Consequences

To avoid removal from the RMD, Techcom Connect LLC has:

- Addressed all identified deficiencies by implementing this updated Robocall Mitigation Plan.
- Provided a clear explanation of compliance actions to the Enforcement Bureau.
- Uploaded all required certifications and documentation to the FCC portal by December 20, 2024.

Conclusion

Techcom Connect LLC is committed to supporting the FCC's efforts to eliminate unlawful robocalls. This plan reflects our dedication to compliance, transparency, and proactive measures to protect consumers and voice service providers. Should further information be required, please contact our Compliance Officer, Ronald Franklin, at ronald@techcomconnect.com or 208-314-8044.

Sincerely,

Ronald Franklin

Compliance Officer
Techcom Connect LLC
9169 W State St, #3242
Garden City, ID 83714
ronald@techcomconnect.com
208-314-8044