

TeleTechnology Robocall Mitigation Program - 2024-06-14

This Robocall Mitigation Plan describes the specific reasonable steps that TeleTechnology, LC (dba Vinculum Communications, hereafter referred to as “Vinculum”) has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

Vinculum has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. Vinculum’s business customers are small businesses that are physically located in our service territory. Prior to a new business customer ever making a call on Vinculum’s network, we personally know, or get to know, the business owners and/or management. This personal touch gives Vinculum a clear view of whether the business is a risk for originating illegal robocalls.

“Know-Your-Customer” Procedures

Currently, the only US customer from which Vinculum receives traffic is ESI. Vinculum’s connection with ESI has been in place for many years, and we know this customer very well. Before accepting traffic from any new customers, Vinculum would exercise due diligence and seek to ensure that the customer is not using Vinculum to carry or process illegal traffic. Specifically, Vinculum would collect information such as the customer's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Commitment to Law Enforcement Cooperation

Vinculum cooperates fully with investigative authorities, industry traceback groups, the FCC and the official consortium designated to lead private traceback efforts. We have a single contact individual designated to handle all traceback requests and coordinate with outside investigations.

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