

Totelcom Networks, LLC

Robocall Mitigation Program

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

What follows are the specific reasonable steps Totelcom Networks, LLC has taken to avoid originating illegal robocall traffic.

- Totelcom Networks, LLC has a “know your customer policy” to prevent your services from being used to originate illegal traffic. We extensively investigate potential business customers seeking access to high-volume origination services prior to providing service by collecting information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.
- Totelcom Networks, LLC requires all business customers to sign contracts that contain provisions that allow for termination in the event high-volume origination services are abused by new and renewing customers. Totelcom Networks, LLC will not hesitate to enforce them if necessary.
- Totelcom Networks, LLC exercises due diligence before accepting traffic from an upstream provider by collecting said provider’s physical business location, contact person(s), and nature of their business. All contracts with upstream providers contain provisions that allow for termination of access in the event of a high volume of illegal traffic.
- While not using direct analytics software, Totelcom Networks, LLC staff frequently monitor switched traffic volume and logs for abnormal patterns. All upstream providers that Totelcom Networks, LLC interconnects, monitor traffic with automated systems and will notify Totelcom Networks, LLC of any and all high volume, illegal activity.
- Totelcom Networks, LLC commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry or process illegal robocalls.