

Robocall Mitigation Policy

Robocall Mitigation Compliance with TRACED Act

Date	On behalf of	Change Summary
Feb 9, 2024	Transtelco, Inc.	Initial Version
Feb 27, 2026	Transtelco, Inc. d/b/a Flo Networks	Reviewed and Refiled

Objective:	Establish and follow a policy that is compliant with TRACED Act
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I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

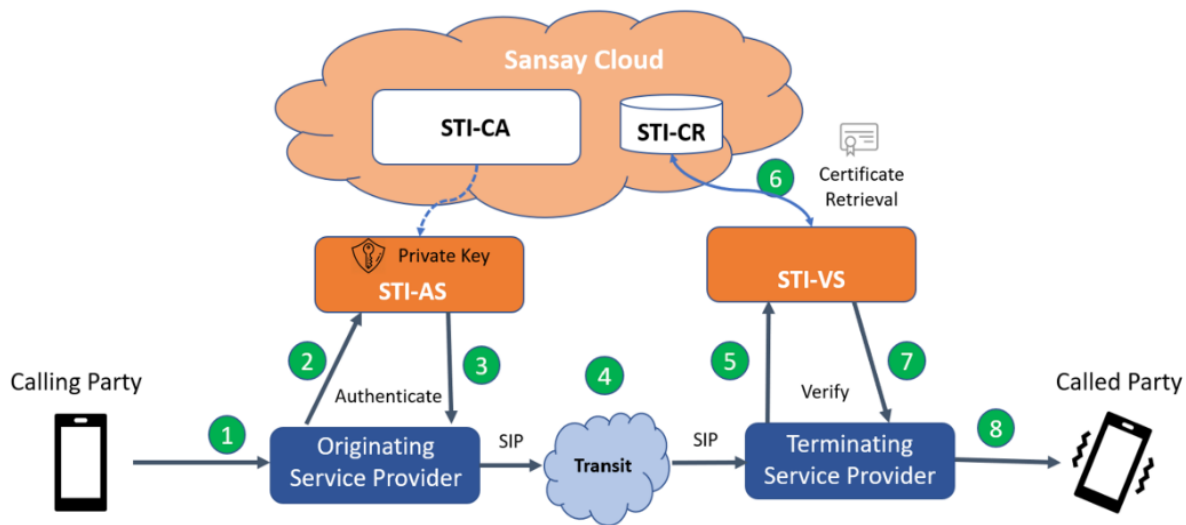
- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of Transtelco, Inc. doing business as Flo Networks. Transtelco provides end-user business only VoIP interconnected services to a select handful of companies within its two service territories in El Paso and McAllen Texas. Transtelco also provides a very small amount of resold (from Verizon) VoIP services in other areas to meet customer demands for multi-site service.

Transtelco has implemented STIR/SHAKEN since April 2021 using Sansay as our certified authority. Sansay is one of only six approved certification authorities and our fully deployed solution provides a scalable, flexible, and secure service in which STIR/SHAKEN can be deployed and managed. As our provider Sansay offers the following benefits:

- Horizontal On-demand Scalability – supports N nodes per customer.
- Certificate Control – real-time certificate acquisition, renewal, and revocation.
- Flexible – can be deployed in any virtual environment, as an appliance in your data center, or fully managed by Sansay.
- Geo-redundant with dedicated resources for each customer.
- Reliable – 99.999% uptime guarantee.
- High Performance – 8,000 queries per second per node.
- Powerful Attestation Controls – by TN, Trunk ID, and SBC.
- Friendly – easy to understand UI, automated or manual certificate renewal, and rich API's (REST/SOAP).

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II. General Prohibition Against Illegal Robocalling

Transtelco end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the Transtelco service to engage in or in connection with fraudulent activities

In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

Transtelco’s end users are notified that Transtelco may take action up to suspension or termination of service for violation of the TOS.

III. Know Your Customer

In addition to STIR/SHAKEN implementation, Transtelco utilizes the mitigation technique of “Know Your Customer.” Transtelco is an established provider that maintains a close relationship with its customers. Its customers are business users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities from our 24x7 Network Operations Center.

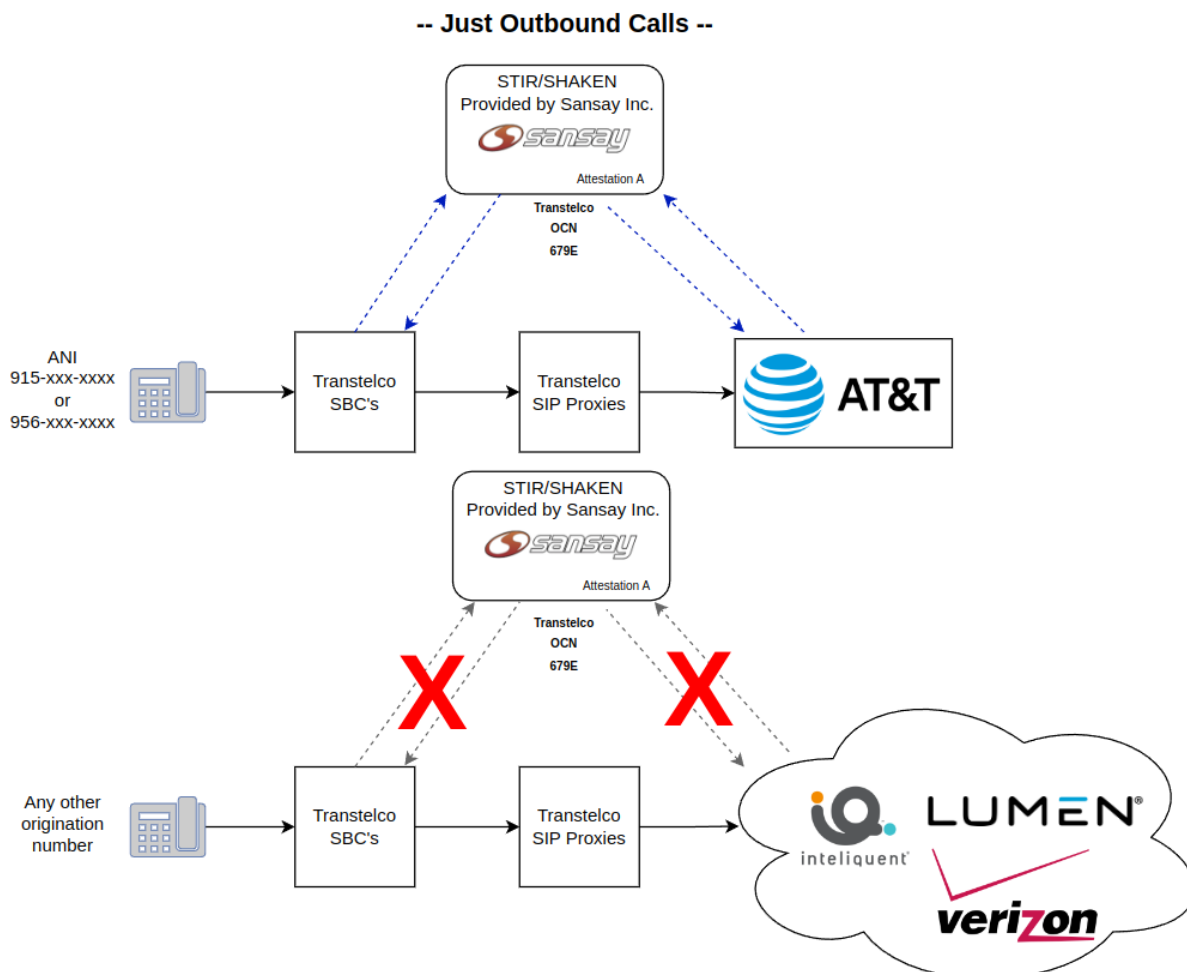
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Transtelco has a screening for new customers requesting service at or above large volume calling capability levels:

- We will not deploy residential service or business service at an address shown in records as being residential
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- A Transtelco representative may visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

IV. Network Structure

Transtelco is an interconnected CLEC for the areas of El Paso and McAllen TX. with OCN 679E. Transtelco uses Attestation level A for all calls with area code 915 and 956 and sent to AT&T, for any other origination numbers the calls are not certified and are sent to our interconnection carriers as show.



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Attestation policies for origination ANI 915.956

Policies

Add + Edit ✎ Delete 🗑 Import ↑ Export ↓ Refresh ↻

[Regular] [Validated Base Passport resigning to FullAttestation]

Policy Table Entries				
Page 1 of 1 25 View 1 - 4 of 4				
☐	SbclD	Otg	Ani	Action
☐	any	any	+1915	Attest A
☐	any	any	+1956	Attest A
☐	any	any	1915	Attest A
☐	any	any	1956	Attest A

V. Traceback and Enforcement Cooperation

Transtelco actively cooperates with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. Transtelco will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

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