

Robocall Mitigation Plan

(Updated: 01/07/2026)

Business Information

CT-TSG LLC
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Brookfield, CT 06804

RMD Contact

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Overview

In the Commission's recent release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

CT-TSG LLC ("CT-TSG") is a small VSP dedicated to stopping illegal robocalls. CT-TSG is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. As such, CT-TSG was previously exempt from the FCC's STIR/SHAKEN rules. The R&O requires that pure resellers such as CT-TSG now file RMPs. This document delineates CT-TSG's RMP. Because CT-TSG does not have access to the necessary infrastructure, it relies on its upstream carrier to assist in robocall mitigation. As delineated herein, CT-TSG works closely with its upstream provider to carry out the required mitigation functions.

Know Your Customer ("KYC")

CT-TSG customers are 98% public sector municipal government, schools, libraries etc. and 2% private sector commercial. CT-TSG does not provide any residential services. All customers are

contracted with a face-to-face process after verifying the validity of the entity's information. Customer cannot change Caller ID; CT-TSG scrutinizes all caller ID change requests before submitting them to the underlying carrier.

CT-TSG's KYC program involves obtaining specific subscriber information when a contract is executed for services. This process includes collecting such information such as:

- physical business location;
- contact person(s);
- nature of the customer's business.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51, CT-TSG provides the following information concerning its upstream voice service carrier.

CT-TSG uses three upstream providers who are responsible for carrying all voice traffic:

Windstream Enterprise Holdings, LLC / Uniti Solutions
2101 Riverfront Drive
Little Rock, AR 72202
Phone: (800) 600-5050
Email: windstream.robocall.mitigation@windstream.com

MIX Network
608 Robin Rd
Lakeland, FL 33803
Phone: (863) 500-5000
Email: support@mixnetworks.com

SkySwitch
Arbor Crest I, 751 Arbor Way, Suite #150
Blue Bell, PA 19422
Phone: (747) 777-8100
Email: compliance@skyswitch.com

CT-TSG has a master service agreement with its upstream providers and has received assurances from its officials that it will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to CT-TSG customers. CT-TSG and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

CT-TSG maintains an AUP that subscribers must sign before being permitted to use CT-TSG's services. Among other things, the AUP prohibits any illegal, abusive or unethical activity, including, but not limited to, perpetration of fraud, libel, defamation or other violations of privacy, promoting or conducting gambling, or engaging in intimidation or other forms of harassment.

Mitigation During Service

CT-TSG works with its upstream providers to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, CT-TSG works with its upstream provider to follow defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Because CT-TSG does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in CT-TSG's analytics.

CT-TSG follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, CT-TSG will devote sufficient resources to provide prompt and complete resources to traceback requests.

CT-TSG works with its upstream providers to investigate suspicious activity found by the carrier's monitoring systems or reported to CT-TSG by subscribers or third parties. The investigation could potentially result in opening a traceback request or with CT-TSG contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

For all new and renegotiated CT-TSG contracts governing the transport of voice calls, CT-TSG will endeavor to contractually require CT-TSG's subscribers to cooperate in traceback investigations.

Blocking

CT-TSG will implement Do Not Originate requests it receives from the ITG. CT-TSG's upstream providers have mechanisms to automatically block suspicious calls using internal analytics. If CT-TSG and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, CT-TSG will take appropriate action which may include suspending or terminating the subscriber's use of CT-TSG CT-TSG's service. CT-TSG will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement, including the state attorney general's office), as well as the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. CT-TSG will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, CT-TSG will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Joseph Sauer

I, Joseph Sauer, Managing Member of CT-TSG, do hereby certify, under penalty of perjury, the following:

- (1) CT-TSG, by virtue of its status as a "pure reseller" does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its customer's network.
- (2) CT-TSG's Business name and primary address are as follows:

CT-TSG LLC
4 Sand Cut Rd STE 7
Brookfield, CT 06804
- (3) CT-TSG has no other business names in use.
- (4) CT-TSG operated as DBO-TSG LLC until February 1st, 2024.
- (5) The following persons own more than 10% of CT-TSG each: Joseph Sauer, Gary Hemmingstad. Neither of them have had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (7) CT-TSG's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (8) CT-TSG has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (9) CT-TSG is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (10) CT-TSG does not have an operating company number and is not required to have one.



Joseph Sauer, Managing Member