

TruTelco, LLC

Robocall Mitigation Plan

Annual FCC Robocall Mitigation Database Recertification – 2026

1. Regulatory Compliance Commitment

TruTelco, LLC maintains and actively enforces a robocall mitigation program reasonably designed to prevent the origination and transmission of unlawful robocalls in compliance with 47 C.F.R. § 64.6305 and applicable FCC Orders.

2. Provider Role and Intermediate/Gateway Positioning

TruTelco, LLC operates primarily as an Intermediate Provider and, where applicable, as an Originating Provider. As an intermediate provider, TruTelco, LLC exercises reasonable due diligence over upstream and downstream partners, monitors traffic transiting its network, and implements mitigation controls consistent with FCC guidance for gateway and intermediate providers. TruTelco, LLC does not knowingly originate or transmit unlawful robocall traffic.

3. STIR/SHAKEN Implementation and Attestation Handling

TruTelco, LLC has implemented STIR/SHAKEN authentication within the IP portions of its network. Where acting as the originating provider, TruTelco, LLC authenticates outbound calls in accordance with ATIS standards and FCC requirements. Where acting as an intermediate provider, TruTelco, LLC passes STIR/SHAKEN authentication information through without alteration and supports end-to-end authentication integrity. TruTelco, LLC maintains valid STI certificates issued by an approved Certification Authority and participates in the Secure Telephone Identity ecosystem.

4. Know Your Customer (KYC) Controls

TruTelco, LLC conducts risk-based due diligence prior to customer activation, including verification of legal entity status, business registration, principal contacts, and intended service use. Service is not activated until compliance review is completed.

5. Traffic Monitoring and Mitigation

TruTelco, LLC employs ongoing traffic analytics to detect anomalous call patterns, including volume spikes, abnormal call durations, and repetitive dialing behavior. Suspicious traffic is promptly investigated and may result in immediate suspension.

6. Traceback Response Protocol

TruTelco, LLC responds within 24 hours to Industry Traceback Group, FCC, or law enforcement inquiries. Upon receipt of a traceback notice, TruTelco, LLC initiates investigation, identifies responsible parties, requires corrective action, and suspends traffic where appropriate.

7. Upstream/Downstream Compliance Verification

TruTelco, LLC verifies that applicable voice service customers are properly registered in the FCC Robocall Mitigation Database and may refuse traffic from entities failing to maintain compliance.

8. Network Security Controls

TruTelco, LLC maintains network security safeguards including multi-factor authentication, restricted administrative access, trunk configuration monitoring, and access logging controls.

TruTelco, LLC certifies that this Robocall Mitigation Plan is actively implemented and reasonably designed to prevent unlawful robocall origination and transmission.

Executed this 28 day of February, 2026.

Jack Kaplan

Jack Kaplan - CEO
TruTelco, LLC