

TalkFlo Communications Inc.

Robocall Mitigation Program

Introduction

TalkFlo Communications (commonly and subsequently referred to as TalkFlo) is a small, Calgary-based VoIP services provider of hosted PBX solutions to locally owned small-to-medium sized businesses. We do not offer residential services. This document will outline TalkFlo's Robocall Mitigation Program (RMP), our STIR/SHAKEN implementation approach, and our compliancy obligations to the FCC.

STIR/SHAKEN Implementation and Exemption

47 CFR § 64.6305 (a)

TalkFlo Communications Inc. does not have direct control over the network infrastructure necessary to implement STIR/SHAKEN. Our sole carrier and SIP trunk provider, Skyetel, has A Level Attestation re STIR/SHAKEN call authentication/implementation. Validation and attestation are performed on Skyetel's network. All numbers (DIDs) managed by TalkFlo are within Canadian rate centres. Any unused numbers within our inventory are set to Out-of-Service.

Robocall Mitigation

TalkFlo's services are offered in Canada only. We utilize and depend on the STIR/SHAKEN-enabled infrastructure of our sole telecoms traffic provider. We do not provide overseas calling services; our outbound traffic is limited to Canada and the US, only.

Our customers must sign documentation ensuring that the services supplied cannot be used in conjunction with call-centre type applications, auto-dialers, or for mass cold-calling. All our customers are limited in total number and frequency of allowed outbound calls. Customer call activity is regularly reviewed monthly using data supplied by Skyetel and our 3CX PBXs. Customers found to be in violation of these requirements may be refused service by TalkFlo Communications.

Our customers must utilize CLID for numbers residing in our inventory. We do not allow number spoofing and we utilize Skyetel's SPAM-block service for inbound calls. To date, we have had zero compliancy issues.

Traceback

TalkFlo will respond to all traceback requests from relevant authorities promptly. A traceback request will result in immediate review of the customer's call history, and we will engage with the customer to determine reason and appropriate steps to mitigate. If the reason(s) given are deemed invalid, illegal or non-compliant, on first offense, the customer will be given an opportunity to correct the issue. Subsequent violations are grounds for a termination of services with TalkFlo.