



TECMONY

A HARMONY FROM TECHNOLOGIES

TECMONY

ROBOCALL MITIGATION PROGRAM DESCRIPTION

09/21/2020



1. COMPANY OVERVIEW

TECMONY YAZILIM BILISIM VE DANISMANLIK HIZMETLERI LTD.STI. is a telecommunications infrastructure provider based in Turkey, offering secure voice communication services to corporate clients. Our FRN is 003642577.

1.1 Ownership and Management

- Principal Owner (100%): Mehmet Ceyhun Güler
- Technical Operations Management: Ozgur Ozdurhan / Ramazan Başoğlu

2. INFRASTRUCTURE AND SECURITY ARCHITECTURE

2.1 Network Infrastructure

- Hosted in secure Turk Telekom data centers
- Closed NGN SIP Trunk environment
- No public internet access
- Geographic redundancy across multiple locations
- 24/7 active monitoring and response systems

2.2 Security Measures

- TLS-encrypted SSL TRUNK connections only
- Dedicated secure trunk lines per client
- Multi-layer authentication and verification
- Real-time traffic monitoring and anomaly detection
- Automated threat detection and blocking systems

3. CLIENT ONBOARDING AND VERIFICATION

3.1 Client Verification Process

- Corporate identity verification
- Business registration validation
- Technical infrastructure assessment
- Compliance documentation review
- Service agreement with regulatory compliance terms

3.2 Required Documentation

- Corporate registration documents
- FCC Registration Numbers (FRN)
- Authorized contact information
- Technical infrastructure documentation
- Compliance commitment agreements

4. OPERATIONAL CONTROLS

4.1 Traffic Management

- 90% inbound traffic focus
- Strict outbound call control
- Real-time traffic pattern monitoring
- Automated suspicious pattern detection
- Immediate blocking capabilities for suspicious activities

4.2 Outbound Campaign Management

- Mandatory FCC Registration ID verification
- Pre-approval process for outbound campaigns
- Documentation requirements for marketing campaigns
- Compliance verification before activation



- Regular audit of outbound traffic patterns

5. ILLEGAL ROBOCALL PREVENTION

5.1 Technical Measures

- IP whitelist enforcement
- TLS encryption requirement
- Traffic pattern analysis
- Volume monitoring and throttling
- Automated blocking of suspicious patterns

5.2 Administrative Controls

- Regular client audits
- Documentation maintenance
- Compliance verification
- Regular staff training
- Incident response procedures

6. TRACEBACK AND COOPERATION PROCEDURES

6.1 Traceback Response Protocol

- 24/7 response capability
- Dedicated response team
- Comprehensive call records maintenance
- Rapid information retrieval system
- Standardized response procedures

6.2 Law Enforcement Cooperation

- Designated law enforcement liaison
- Standard operating procedures for requests
- Rapid response capabilities
- Complete cooperation commitment
- Documentation preservation protocols

7. COMPLIANCE AND MONITORING

7.1 Compliance Measures

- Regular compliance audits
- Documentation updates
- Staff training programs
- Policy review and updates
- Incident response drills

7.2 Monitoring Systems

- Real-time traffic monitoring
- Pattern analysis
- Anomaly detection
- Alert systems
- Response procedures

8. INCIDENT RESPONSE AND REPORTING

8.1 Incident Response Plan

- Immediate response protocols
- Escalation procedures
- Documentation requirements
- Client notification process



- Regulatory reporting procedures
- **8.2 Reporting Procedures**
- Internal reporting structure
- External reporting requirements
- Documentation standards
- Follow-up procedures
- Improvement implementation

9. COMMITMENT TO COMPLIANCE

TECMONY commits to: 1. Respond to all traceback requests within 24 hours 2. Cooperate fully with FCC and law enforcement 3. Maintain comprehensive records 4. Regular program updates and improvements 5. Continuous monitoring and enhancement of security measures

10. PROGRAM MAINTENANCE AND UPDATES

This program is reviewed and updated regularly to ensure continued effectiveness and compliance with regulatory requirements. All updates are documented and communicated to relevant stakeholders.