

ROBOCALL MITIGATION & STIR/SHAKEN ATTESTATION POLICY

Provider: ADATA Holdings LLC d/b/a TeleComcepts **Filer ID:** 837700 **FRN:** 0037009859
OCN: 537L **Date:** December 15, 2025

1. Provider Type

TeleComcepts is a non-facilities-based interconnected VoIP provider. We do not directly interconnect with the Public Switched Telephone Network (PSTN). All SIP traffic is routed through our upstream carriers, who are fully STIR/SHAKEN compliant and sign calls on our behalf.

2. Call Origination Practices

TeleComcepts provides VoIP and SIP trunking services to:

- Business end users
- Resellers, including PBX installers and IT solution providers

We assign DIDs and enable outbound calling via IP-based interconnections. While we originate SIP traffic, we do not currently sign outbound calls ourselves. Our upstream carriers perform call authentication and SHAKEN signature insertion prior to PSTN termination.

3. STIR/SHAKEN Status and Implementation

- **Status:** No Implementation (Relying on Upstream Providers)
- **Upstream Partners:**
 1. **Bandwidth Inc.** (FRN: 0015443773)
 2. **Intermedia Voice Services, Inc.** (FRN: 0021210786)

Outbound calls are routed exclusively through these upstream networks. Both partners:

- Sign calls using their own SHAKEN certificate/token.
- Assign Attestation levels (A, B, or C) based on their visibility into the call source.
- Perform all necessary authentication functions before traffic reaches the PSTN.

Future Readiness: TeleComcepts is currently evaluating the steps necessary to directly implement STIR/SHAKEN, including applying with the STI-GA to obtain SHAKEN token eligibility and upgrading softswitch infrastructure to support SIP Identity header insertion.

4. Robocall Mitigation Strategy

To prevent illegal robocalls from originating on our network, TeleComcepts implements the following mandatory controls:

A. Customer Vetting (Know Your Customer)

- All new customers are manually reviewed before service activation.
- Services are only extended to businesses with:
 - A verifiable business name and physical address.
 - A valid Federal EIN or State Articles of Incorporation.
 - An active website confirming commercial legitimacy.
- High-volume or automated dialing use cases undergo enhanced review.

B. Acceptable Use Policy (AUP) All customers must execute a Master Service Agreement that explicitly prohibits:

- Caller ID spoofing with intent to defraud.
- Robocalling without prior express written consent (TCPA violations).
- Use of our services for illegal, fraudulent, or abusive behavior. **Indemnification:** Customers agree to indemnify TeleComcepts for any penalties or traceback fees resulting from their traffic.

C. Traffic Monitoring Call Detail Records (CDRs) are actively monitored for suspicious patterns, including:

- Abnormally short-duration (SDC) calls (e.g., Average Call Duration < 6 seconds).
- High-volume call bursts to unverified destinations.
- Low Answer Seizure Ratios (ASR). Suspect activity results in immediate investigation and, where necessary, service suspension.

D. Traceback Cooperation TeleComcepts fully cooperates with:

- The **Industry Traceback Group (ITG)**.
- FCC Enforcement Bureau and state law enforcement agencies.
- Upstream provider compliance teams (Bandwidth & Intermedia). We commit to responding to all traceback requests within 24 hours.

5. Contact for Compliance Inquiries

Compliance Officer: Max Charlot **Company:** ADATA Holdings LLC d/b/a TeleComcepts
Email: compliance@telecomcepts.com (Monitored 24/7) **Phone:** (909) 583-8000 **Address:**
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