

Robocall Mitigation Program Description

Text Groove Communications Inc.

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Overview:

Text Groove Communications Inc. is a Canadian-based foreign voice service provider. Our operations include **accepting inbound calls from the U.S. public switched telephone network (U.S. PSTN)** for delivery within our Canadian network. We do **not originate or terminate outbound voice traffic to the U.S.**, nor do we assign NANP numbers for outbound calling.

Scope of Service:

- We **only receive inbound traffic** from U.S.-based carriers.
 - We do **not originate or pass outbound calls to the U.S. PSTN**.
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Robocall Mitigation Plan:

While we do not originate calls to the U.S., Text Groove Communications Inc. is committed to maintaining call integrity and preventing illegal robocall traffic. Our mitigation efforts include:

- **Inbound Traffic Controls:**
 - We accept inbound U.S. traffic only from vetted upstream carriers with active FCC RMD listings which are whitelisted in our infrastructure.
 - We monitor for high-volume or unusual call patterns in inbound traffic.
- **Customer Vetting & Controls:**
 - We maintain strict onboarding procedures for all customers to ensure legitimate use of inbound voice services.
 - No downstream partners or customers are permitted to route traffic into the U.S.
- **Traceback and Regulatory Cooperation:**
 - We fully cooperate with traceback requests from the USTelecom Industry Traceback Group (ITG), Canadian authorities, and the FCC.

- We maintain logs sufficient to identify call paths and traffic origination points in the event of a robocall investigation.
- **Internal Abuse Monitoring:**
 - We employ analytic monitoring of call volumes, durations, and destination patterns to detect potential misuse of inbound service.

STIR/SHAKEN Applicability:

Text Groove Communications Inc. does **not originate IP-based calls to the U.S.**, and therefore **is not subject to STIR/SHAKEN implementation requirements** under FCC rules (47 CFR § 64.6301).

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Declaration:

Text Groove Communications Inc. certifies under penalty of perjury that the information provided herein is true and accurate, and reflects our current operational practices and mitigation efforts as of the date of filing.