

Robocall Mitigation Program Description

Telecom2 Robocall Mitigation Program Description

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CONFIDENTIALITY REQUEST:

The filer requests that portions of this document be treated as confidential pursuant to FCC procedures and has submitted a confidentiality request in the FCC's Electronic Comment Filing System (ECFS).

DESCRIPTION OF PROGRAM:

Telecom2 (T2) is a SIP-based voice service provider, which needs through market demand to begin originating outbound calls from the U.S. for its corporate clients. While T2 provides the outbound calling infrastructure, all telephone numbers are assigned and managed by national resellers such as Bandwidth.com, which will also handle return/inbound call routing and CLI presentation..

T2 has been operating in the United Kingdom since 2009 and is licensed and regulated under OFCOM as a telecommunications operator. This long-standing presence reflects Telecom2's deep experience and ongoing compliance with rigorous industry standards.

The company operates a robust and redundant network infrastructure across multiple sites, ensuring high availability and service resilience. T2 is dedicated to innovation and invests in advanced technologies to provide secure and high-quality communication services to its clients.

T2 has implemented a robocall mitigation program in accordance with 47 CFR § 64.6305(a), as it currently does not have full STIR/SHAKEN implementation across all traffic. The exemption claimed

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under 47 CFR § 64.6304(a)(2) applies because T2 does not obtain numbers directly from the North American Numbering Plan Administrator (NANPA) or Pooling Administrator and is therefore ineligible to obtain a STIR/SHAKEN certificate from the STI-GA.

The robocall mitigation practices implemented by T2 include:

- Enforcing strict Know-Your-Customer (KYC) policies during onboarding to prevent high-risk or fraudulent customers.
- Employing traffic monitoring and anomaly detection to identify and flag suspicious call patterns.
- Operating multiple traffic monitoring tools, including advanced CLI (Calling Line Identification) manipulation detection systems.
- Completely blocking customers from altering CLI fields, especially for U.S.-bound traffic, to ensure compliance and prevent spoofing.
- Implementing network-level filtering to block known robocall campaigns and calling patterns indicative of illegal robocalls.
- Responding fully and within 24 hours to traceback requests from the FCC, law enforcement, and the USTelecom Industry Traceback Group.
- Cooperating with upstream and downstream providers to identify, investigate, and eliminate sources of unlawful robocall traffic.

Telecom2 is committed to delivering innovative, secure, and customer-centric solutions. The company continues to work toward full STIR/SHAKEN implementation and maintains regular engagement with trusted telecom partners to ensure ongoing compliance with FCC robocall mitigation regulations.