

Robocall Mitigation Plan – TURNKEYISP LLC

Legal Entity Name: TURNKEYISP LLC **Address:** 530-B Harkle Road STE 100, Santa Fe, NM 87505 **Phone Number:** +1 505 395 7130 **FCC Form 499-A Filer ID:** 0037082930 **Date of Formation:** May 18, 2020

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1. Introduction

TURNKEYISP LLC, a New Mexico-based voice service provider established on May 18, 2020, specializes in **outbound Voice over Internet Protocol (VoIP) telephony services**. Our operational model exclusively leverages **Flowroute as our upstream carrier**, which fully implements the **STIR/SHAKEN caller ID authentication framework** and signs all outbound calls on our behalf.

In compliance with FCC regulations (**47 CFR §64.6305**), TURNKEYISP LLC has developed this Robocall Mitigation Plan (RMP) to detail the comprehensive and reasonable steps undertaken to **prevent the origination of illegal robocalls** from our network. This plan applies to all outbound calls originated by TURNKEYISP LLC. We certify that TURNKEYISP LLC has not been prohibited from filing in the Robocall Mitigation Database, and all calls we originate are governed by the stringent protocols outlined herein.

2. STIR/SHAKEN Implementation and Call Authentication

TURNKEYISP LLC fulfills its call authentication obligations by relying on Flowroute's fully compliant STIR/SHAKEN implementation. Flowroute adopted the STIR/SHAKEN framework by the FCC's **June 30, 2021, deadline**, applying cryptographic signatures to the SIP header of all outbound calls originating from TURNKEYISP LLC customers.

- **Attestation Levels:**

- **Full Attestation (A-level):** Issued when a customer's telephone number is registered and verified within Flowroute's system.
- **Partial Attestation (B-level):** Issued when the originator's number is not pre-verified, consistent with industry best practices.

This strategic partnership ensures that all calls originating from TURNKEYISP LLC's network are **robustly authenticated** before entering the public telephone network, effectively meeting our call authentication responsibilities through Flowroute's FCC-registered mitigation plan and signing procedures.

3. Customer Vetting and Due Diligence (Know Your Customer/Business)

TURNKEYISP LLC implements **rigorous Know-Your-Customer (KYC) and Know-Your-Business (KYB) procedures** to prevent the use of our services for illicit activities. Before provisioning outbound calling services, we collect and verify critical customer information, aligning with FCC guidance on best practices.

- **Information Collected:** Legal name, business address, state of incorporation, federal tax identification number, and names of principal contact persons.
- **Business Purpose Validation:** Customers must clearly articulate a legitimate business purpose for utilizing outbound voice services. **Prohibited uses include unvetted marketing, polling, political campaigns, or any non-business-related outbound activities.**
- **Number Ownership Verification:** All telephone numbers designated for calling are validated to confirm ownership or lawful control by the customer.
- **Spam/Blacklist Screening:** Requested numbers are cross-referenced against known industry spam and blacklist databases to prevent the activation of any number associated with prior abuse.

These stringent vetting measures ensure that only reputable businesses with legitimate use cases access our network, thereby preventing fraud and misuse.

4. Traffic Monitoring and Analytics

TURNKEYISP LLC maintains continuous oversight of its network traffic to identify and mitigate irregular or potentially illegal activities.

- **Data Retention and Analysis:** Detailed **Call Data Records (CDRs)** for all outbound calls are meticulously maintained, capturing originator and destination numbers, date/time, duration, and session specifics.
- **Anomaly Detection:** We analyze call volumes and patterns to detect anomalies such as

sudden spikes in outbound calls, unusual usage hours, or attempts to dial large blocks of numbers.

- **Automated Alerting:** Automated alerts are configured to promptly notify TURNKEYISP LLC staff of any traffic patterns indicative of a potential robocall campaign or network misuse.

Upon identification of suspicious or high-volume unlawful traffic by TURNKEYISP LLC or Flowroute, an immediate investigation is initiated. If illegal robocall traffic is confirmed, TURNKEYISP LLC will **promptly suspend the responsible account and block the offending calls in real-time**. In accordance with FCC rules, we will block any traffic identified as illegal robocalling and maintain a "**Do-Not-Originate**" (**DNO**) **blocklist** to prevent calls on numbers designated as fraudulent or unauthorized. These proactive monitoring and blocking steps are crucial for intercepting unwanted calls before they impact the public network.

5. Complaint Handling and Traceback Response

TURNKEYISP LLC has established robust processes for addressing complaints and responding to traceback requests, prioritizing swift and thorough resolution.

- **24-Hour Response Commitment:** We commit to responding fully to any inquiry from the FCC, law enforcement, or the Industry Traceback Group **within 24 hours**, as mandated by the Commission.
- **Employee Training:** All employees receive training to treat robocall complaints with utmost urgency.
- **Investigation Protocol:** Upon receipt of a complaint or traceback notice, TURNKEYISP LLC will promptly gather relevant call data records and coordinate with Flowroute and any intermediate carriers to trace the call path.
- **Remedial Action:** If the source of illegal traffic is traced to a TURNKEYISP LLC customer, the company will immediately block that customer's traffic and may terminate service if abuse is verified.

TURNKEYISP LLC pledges full cooperation with authorities in any investigation of illegal robocalling, including providing requested records and assisting in identifying offending parties. Our carrier agreements explicitly require upstream providers to support traceback efforts, ensuring timely information exchange from Flowroute. We are fully committed to compliance with the FCC's traceback rules and will continuously refine our call handling procedures to prevent recurrence of identified issues.

6. Policies, Training, and Ongoing Compliance

Maintaining an effective Robocall Mitigation Plan is an ongoing commitment for TURNKEYISP LLC.

- **Personnel Training:** All personnel involved in service onboarding or network operations receive regular training on anti-robocall policies and vetting procedures.
- **Internal Audits:** Regular internal audits of customer files and call logs are conducted to ensure strict adherence to this plan.
- **Customer Acknowledgement:** New customers are required to acknowledge compliance with anti-robocall requirements in their service agreements.

TURNKEYISP LLC acknowledges the dynamic nature of FCC regulations. This RMP will be **reviewed and updated at least annually** or whenever new regulations are adopted, such as the FCC's recent extension of traceback and blocking obligations to all providers and requirements for updates to mitigation plans in the Robocall Mitigation Database. This plan will be filed in English and maintained current in the Robocall Mitigation Database.

7. Regulatory Commitment

By submitting this Robocall Mitigation Plan, TURNKEYISP LLC certifies its comprehensive program of reasonable steps to prevent illegal robocalls. All calls originated by TURNKEYISP LLC are covered by this program. We affirm our unwavering commitment to **fully comply with all FCC anti-robocall rules and the TRACED Act.**

TURNKEYISP LLC is dedicated to continuous improvement of its policies and will actively collaborate with regulators and industry groups to combat illegal robocalling. Through **diligent customer vetting, proactive traffic monitoring, swift complaint resolution, and robust call authentication via Flowroute**, TURNKEYISP LLC is resolute in actively mitigating unlawful call traffic and protecting consumers in accordance with FCC mandates.

References:

- Flowroute & STIR/SHAKEN: <https://flowroute.com/blog/flowroute-stir-shaken/>
- 47 CFR § 64.6305 - Robocall mitigation and certification.: <https://www.law.cornell.edu/cfr/text/47/64.6305>
- Know Your Customer: FCC Requirements Explained – Commio: <https://www.commio.com/blog/know-your-customer/>
- FCC Extends Robocall Rules to All Voice Providers, Requires Updates to Mitigation Database Filings - JSI: <https://www.jsitel.com/resource/fcc-extends-robocall-rules-to-all-voice-providers/>
- FCC Expands Call Blocking Requirements for Voice Service Providers: Wiley: <https://www.wiley.law/alert-FCC-Expands-Call-Blocking-Requirements-for-Voice-Service-Providers>

