

Robocall Mitigation Plan

Telsis LLC

Legal Company Name:	Telsis LLC
FCC Form 499 Filer ID:	837844
Operating Company Number (OCN):	160M
Provider Classification:	Domestic Voice Service Provider
Network Type:	All-IP Network
Point of Contact:	Joseph Robert Rich
Contact Email:	joseph@telsis.net

1. Purpose and Scope

This Robocall Mitigation Plan ("Plan") is submitted by Telsis LLC ("Telsis" or the "Company") in accordance with the requirements of the Federal Communications Commission ("FCC") under 47 C.F.R. § 64.6305 and the TRACED Act. This Plan describes the specific, reasonable steps Telsis has implemented and continues to implement to prevent unlawful robocalls from originating on its network, and confirms Telsis's participation in the FCC's Robocall Mitigation Database ("RMD").

2. Company Overview

Telsis LLC is a domestic voice service provider operating an all-IP network. Telsis is identified with the FCC under 499 Filer ID 837844 and holds Operating Company Number (OCN) 160M.

3. STIR/SHAKEN Caller ID Authentication

Telsis operates an all-IP network and has fully implemented the STIR/SHAKEN caller ID authentication framework across that network, in accordance with 47 C.F.R. § 64.6301. Telsis authenticates and signs outbound calls originating on its network consistent with the ATIS/SIP Forum IP-NNI STIR/SHAKEN standards, and validates signed calls received from other providers where applicable.

4. Robocall Mitigation Practices

In addition to full STIR/SHAKEN implementation, Telsis has adopted the following robocall mitigation practices and internal controls, which are applied across its network on an ongoing basis:

- **Know Your Customer (KYC):** Telsis performs identity verification and due diligence on all customers prior to originating traffic on their behalf, including validation of business legitimacy and intended calling use case.
- **Call Traffic Monitoring:** Telsis monitors originating call traffic patterns for anomalies indicative of illegal robocalling, such as abnormal call volumes, high-frequency short-duration calls, and suspicious calling patterns.
- **Contractual Prohibitions:** Telsis's customer agreements expressly prohibit the use of its network to originate illegal robocalls, spoofed caller ID, or other traffic in violation of the Telephone Consumer Protection Act (TCPA), the Truth in Caller ID Act, and related FCC rules.
- **Mitigation and Remediation:** Where suspicious or unlawful traffic is identified, Telsis takes prompt mitigating action up to and including suspension or termination of the responsible customer's service.
- **Traceback Cooperation:** Telsis fully cooperates with all traceback requests, as described in Section 5 below.
- **Regulatory Compliance:** Telsis maintains compliance with all applicable FCC rules and regulations governing robocall mitigation, caller ID authentication, and consumer protection.

5. Cooperation with Traceback Requests

Telsis fully participates in and responds to all traceback requests it receives from the USTelecom Industry Traceback Group (ITG), the FCC, and other authorized traceback entities. Telsis is committed to responding to such requests promptly and providing all relevant, available information necessary to identify the source of suspected illegal robocall traffic traversing its network. Telsis designates its point of contact identified above to receive and respond to traceback inquiries. Consistent with applicable law, Telsis will respond to all traceback requests within twenty-four (24) hours of receipt.

6. Robocall Mitigation Point of Contact

Name: Joseph Robert Rich
Company: Telsis LLC
Email: joseph@telsis.net

7. Certification

Telsis LLC certifies that the information contained in this Robocall Mitigation Plan is true and accurate to the best of its knowledge, and that this Plan will be updated as necessary to reflect material changes to Telsis's network, STIR/SHAKEN implementation status, or robocall mitigation practices, consistent with the Company's obligations under 47 C.F.R. § 64.6305.

Name: Joseph Robert Rich
Company: Telsis LLC