

TSS Digital Services Robocall Mitigation Program Description

FCC Registration Number (FRN): 0007784556

Operating Company Number (OCN): 1488

Contact Person for Robocall Mitigation:

- **Name:** Thomas Ellis
 - **Title:** CTO
 - **Email:** tom.ellis@tssdigital.com
 - **Phone:** 360-915-1104
-

I. Introduction and Commitment to Robocall Mitigation

TSS Digital Services is a small voice service provider committed to combating illegal robocalls and protecting our customers and the broader telecommunications ecosystem from fraudulent and unwanted communications. We recognize our responsibility under the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act and the Federal Communications Commission (FCC) rules to take affirmative and effective measures to prevent the origination and transmission of illegal robocall traffic over our network.

This Robocall Mitigation Program (RMP) outlines the reasonable steps TSS Digital Services is undertaking to achieve and maintain compliance with these regulations. We are dedicated to continuous improvement of our practices to adapt to evolving threats and regulatory requirements.

II. STIR/SHAKEN Implementation Status

TSS Digital Services is actively engaged in the full implementation of the STIR/SHAKEN caller ID authentication framework across our Internet Protocol (IP) network.

- **Current Status:** As of July 10, 2025, TSS Digital Services is in the process of obtaining its own Secure Telephone Identity Policy Administrator (STI-PA) Service Provider Code (SPC) token and a corresponding STIR/SHAKEN certificate from an approved Secure Telephone Identity Certification Authority (STI-CA). We are actively working with iConectiv to complete our direct STIR/SHAKEN integration.
- **Transitional Measures (During Implementation):** While our direct STIR/SHAKEN signing implementation is in progress, TSS Digital Services currently relies on its trusted upstream voice service provider, Commio, to sign all calls originated on our network. TSS Digital Services has verified that Commio is a STIR/SHAKEN-compliant entity and is listed in the FCC's Robocall Mitigation Database with a valid STIR/SHAKEN certification. We maintain a contractual agreement with Commio that requires them to apply the highest attainable attestation level (A, B, or C) for calls originated by TSS Digital Services where appropriate.

- **Future Commitment:** Upon successful completion of our direct STIR/SHAKEN implementation, TSS Digital Services commits to signing all eligible outbound calls originating on our network with our own STIR/SHAKEN certificate and applying the appropriate attestation level (A, B, or C) based on our knowledge of the customer and their authorization to use the calling number. We will update this RMP and our filing in the Robocall Mitigation Database to reflect our full STIR/SHAKEN deployment.

III. Robocall Mitigation Practices (Reasonable Steps to Prevent Illegal Robocalls)

TSS Digital Services employs a multi-faceted approach to mitigate illegal robocalls, including but not limited to:

1. Know Your Customer (KYC) Procedures:

- **Customer Vetting:** We conduct thorough vetting of all new and renewing customers, whether residential or business, prior to service activation. This includes collecting essential identification information (e.g., legal name, address, tax ID/EIN, government-issued IDs for individuals) and verifying it against reliable sources.
- **Business Use Case Understanding:** For business customers, we require a clear understanding of their intended use cases for our voice services, including any planned high-volume calling, marketing, or automated communication activities.
- **Contractual Provisions:** All customer service agreements include explicit prohibitions against illegal robocalling, caller ID spoofing, fraudulent activity, and violation of relevant telecommunications laws (e.g., TCPA, TRACED Act, E911 regulations). Contracts stipulate immediate service suspension or termination for violations.

2. Know Your Upstream Provider (KYUP) Procedures:

- TSS Digital Services maintains a comprehensive understanding of our upstream voice service provider(s), including their legal names, business addresses, contact personnel, and their own robocall mitigation practices.
- We verify that our primary upstream provider, Commio, is properly registered in the FCC's Robocall Mitigation Database.
- We regularly review the robocall mitigation strategies of our upstream provider(s) to ensure alignment with our commitment to combating illegal traffic.

3. Telephone Number Validation:

- We implement procedures to confirm that customers have the legal right to use the telephone numbers associated with their outbound calling. This may involve reviewing proof of ownership, lease agreements, or confirmation from a prior carrier.
- We block the origination of calls from unallocated, unassigned, or invalid telephone numbers.

4. Traffic Monitoring and Analytics:

- We utilize internal analytics tools to monitor call traffic patterns for anomalies indicative of illegal robocalling. This includes, but is not limited to, monitoring for:
 - Unusually high call volumes or bursts from new or established accounts.
 - High call attempt rates combined with low average call durations or completion rates.
 - Calling patterns to known fraud or spam destinations.
 - Rapid increases in calls to specific number ranges or countries.
- Alerts generated by our monitoring systems are promptly reviewed by trained personnel for investigation.

5. Enforcement and Mitigation Actions:

- Upon identification or suspicion of illegal robocalling activity, TSS Digital Services takes immediate action, which may include:
 - Prompt investigation of suspicious traffic.
 - Direct communication with the customer to understand the nature of the traffic and demand immediate cessation of any illegal activity.
 - Temporary suspension or permanent termination of services for customers found to be originating illegal robocalls, in accordance with our terms of service.
 - Implementing call blocking for specific numbers or traffic patterns identified as illegal.
 - Reporting confirmed illegal robocallers to relevant authorities (FCC, FTC, law enforcement).

6. Traceback Cooperation:

- TSS Digital Services is committed to fully cooperating with all traceback requests received from the FCC, law enforcement agencies (e.g., Department of Justice, FTC, state attorneys general), and the industry's traceback consortium (the Industry Traceback Group - ITG).
- We maintain clear internal procedures and designate Tom Ellis as the primary contact to ensure prompt and complete responses to traceback requests, typically within 24 hours of receipt. Our systems are designed to provide the necessary call detail records and customer information to facilitate efficient traceback.

7. Training and Awareness:

- Our relevant personnel, including customer support, sales, and technical staff, receive ongoing training on robocall mitigation policies, procedures, and the importance of compliance with FCC regulations.

IV. Attestation and Certification

TSS Digital Services certifies that all calls originated on its network are subject to this Robocall Mitigation Program. We will update this filing as our STIR/SHAKEN implementation progresses and as new mitigation measures are adopted.

V. Affirmative, Effective Measures for New and Renewing Customers

In accordance with FCC rules, TSS Digital Services takes affirmative, effective measures to prevent new and renewing customers from originating illegal calls. This includes:

- **Pre-service vetting:** As detailed in our KYC procedures, no service is provisioned without a thorough assessment of the customer's identity and intended use.
- **Ongoing monitoring:** All customer traffic is subject to continuous monitoring for suspicious patterns, as described in Section III.
- **Acceptable Use Policy (AUP):** Our AUP explicitly defines prohibited activities, including illegal robocalling, and outlines the consequences of non-compliance. Customers are required to acknowledge and agree to this AUP.
- **Responsive Enforcement:** Our commitment to prompt investigation and enforcement against identified illegal traffic (suspension, termination, blocking) serves as a deterrent for both new and renewing customers.

By filing this Robocall Mitigation Program with the FCC, certifies that it has implemented the practices described herein and is taking reasonable steps to prevent illegal robocalls from originating on its network and to cooperate with robocall mitigation and enforcement efforts.