

Robocall Mitigation Program Description – TOTALIP COMUNICACAO MULTIMIDIA LTDA

Company Name: TOTALIP COMUNICACAO MULTIMIDIA LTDA

FRN: 0037337383

Entity Type: Foreign Voice Service Provider

Contact Email: victor.coelho@totalip.com.br

1. Company Role and Scope of Service

TOTALIP COMUNICACAO MULTIMIDIA LTDA is a Brazil-based foreign voice service provider that delivers international voice traffic to the United States through upstream providers. The company does not originate U.S. domestic traffic and does not assign U.S. telephone numbers to end users.

TOTALIP is submitting this robocall mitigation program in accordance with the FCC's rules applicable to foreign providers terminating calls to the U.S.

2. Robocall Mitigation Measures

TOTALIP implements multiple measures to prevent illegal robocalls, spoofed caller IDs, and abuse of its services. These measures include:

- **Know Your Customer (KYC):** We perform identity verification and manual vetting of all clients prior to service activation.
 - **Traffic Monitoring:** Ongoing traffic analysis is conducted to detect unusual call patterns, such as high-volume short-duration calls, which may indicate robocall behavior.
 - **Blocked Destinations:** Access to known high-risk destinations is restricted or monitored.
 - **Terms of Service:** All customers are contractually prohibited from originating illegal robocalls or spoofed traffic.
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3. Investigation and Enforcement

When suspicious traffic is detected:

- The client is notified and the traffic is temporarily blocked or limited.
 - A full review is conducted to determine the cause.
 - If abuse is confirmed, services are terminated and upstream providers are notified if needed.
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4. STIR/SHAKEN

As a foreign provider, TOTALIP is not eligible to sign calls under the STIR/SHAKEN framework but supports its adoption by upstream U.S. carriers.

5. Commitment to Compliance

TOTALIP is committed to compliance with the FCC's robocall mitigation rules and to maintaining accurate, updated information in the Robocall Mitigation Database. We take illegal robocall prevention seriously and actively collaborate with our upstream providers to prevent network abuse.

Confidentiality

We do **not** request confidential treatment of this filing.
