



Robocall Mitigation Plan – TMS Digital

1. Company Information

- **Business Name:** TMS Digital
- **Address:** 60 Dutch Hill Road; Suite 4A
- **Contact Person for Robocall Mitigation Issues:**
 - o Name: Nicholas Solimando
 - o Title: Chief Technology Officer
 - o Email: escalated@tms-digital.com
 - o Phone: 201-957-1643
- **Parent, Subsidiaries, Affiliates:** None

2. Role in the Call Chain

TMS Digital is a **domestic voice service provider** offering hosted VoIP services to business clients. We originate calls on behalf of our customers and interconnect with upstream carriers for call termination.

3. STIR/SHAKEN Status

TMS Digital has implemented **STIR/SHAKEN** call authentication on the IP portions of its network where technically feasible. For any legacy TDM interconnections, calls are subject to our robocall mitigation program described below.

4. Robocall Mitigation Program

TMS Digital maintains a comprehensive robocall mitigation program that includes the following elements:

4.1 Customer Vetting

- We verify the identity of all new customers through **Know-Your-Customer (KYC)** procedures, including business license verification, government-issued identification, and validation of tax identification numbers.
- We deny service to customers who cannot establish a legitimate business purpose or who are identified as high-risk based on FCC or industry guidance.
- Renewing customers undergo periodic account reviews.

4.2 Ongoing Monitoring & Analytics

- All outbound call traffic is subject to monitoring for **high-risk patterns**, including short-duration calls, high-volume spikes, sequential dialing, or other indicators of illegal robocalling.
- We utilize [insert system/vendor name, if applicable] for call analytics and real-time alerts.
- Suspicious accounts are subject to immediate investigation and may be suspended or terminated.

4.3 Upstream Provider Due Diligence

- TMS Digital only partners with upstream carriers who are themselves listed in the FCC’s **Robocall Mitigation Database**.
- We require upstream providers to maintain robocall mitigation programs and STIR/SHAKEN compliance.
- Periodic reviews are conducted to ensure upstream partners remain compliant.

4.4 Traceback Cooperation

- TMS Digital is an active participant in the **Industry Traceback Group (ITG)**.
- We commit to respond fully to any traceback request from the FCC, law enforcement, or the ITG **within 24 hours**.

5. Compliance History

Neither TMS Digital nor any affiliate, subsidiary, or parent company has been subject to FCC or law enforcement action for illegal robocalling, spoofing, or deficiencies in RMD certification in the past two years.

6. Enforcement & Disciplinary Procedures

- Any customer found to be originating illegal robocalls will have service immediately suspended pending investigation.
- Confirmed violators will have contracts terminated and may be reported to law enforcement or industry partners.
- Internal compliance staff review mitigation program effectiveness at least annually.

7. Certification

TMS Digital certifies that:

1. All calls originated on its network are subject to this robocall mitigation program.
2. This mitigation plan is filed in the **FCC Robocall Mitigation Database**.
3. TMS Digital will update this plan if materially changed and remain in full compliance with **47 CFR § 64.6305**.