

TEL TEC, INC. ROBOCALL MITIGATION PLAN

INTRODUCTION

Tel Tec, Inc. (Tel Tec) provides business customers with Internet Services and also provides when and as requested to customers telecommunications services. The company is based in Indiana and provides services on a regionalized basis. The Company provides telecommunications (VoIP Calling) services to customers as and when requested.

The Company is a switchless reseller and is dependent on its underlying provider's support to provision call origination, and monitoring network monitoring, and the Company has no access to the SIP header of any call and/or any IP portion of the call.

This document details the reasonable steps and best-efforts actions taken by Tel Tec Inc. (Tel Tec) to mitigate and eliminate illegal robocalling.

Tel Tec, Inc. is registered with the Federal Communications Commission ("FCC") and holds FRN/CORESID Number 0009747114 and 499Filer ID 823660.

THE COMPANY PRIMARY PLACE OF BUSINESS

1302 S High School Rd
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317-390-8585
www.teltecinc.com

LEADERS OF THE COMPANY ARE:

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KNOW YOUR CUSTOMER

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. Tel Tec requires every subscriber to have a physical address and a primary contact person.

The Company has a rigorous KYC policy for the in order to support the Business Customers that it sells and resells services to. The Company has an in-depth presales process where representatives of the Company work with the prospect or customer to understand all the unique factors of the Customer's business. This objective of this is twofold: a. to get to know the customer; and b. to provide the best possible service to the customer by fully understanding all facets of their business.

The Company performs a thorough credit check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

Not only does the Company have a rigorous intake and Onboarding process where it secures extensive information for Customers but all relationships between the Company and customers are governed by an MSA which specifically states the business Customer is not able to resell any services which the Company resells and the services which are sold to the Customer are strictly for the Customers own internal use.

The Company performs a thorough credit check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

When the Company commences operations with a customer, the Company verifies all new customers with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Additionally, all customers are required to agree to, and; are contractually bound by Tel Tec's strict policies, contractual terms and conditions and a Company Acceptable Use Policy ("AUP") prohibiting the act of fraudulent voice activity as a condition of doing business with Tel Tec.

In the event any customer is found to be in proposed or actual violation of any Company policy as it relates to suspicious traffic and/or possible fraud, the Company has the right to immediately halt, cease and/or suspend the customers account or associated telephone numbers.

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The Company is able to enforce the above actions by using the third-party tools, and analytics systems provided to it by their upstream provider (underlying carrier). The Company uses these tools to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement by its platform provider and underlying carrier. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.

TRACEBACK

The Company is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robo-callers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and any law enforcement agency. The Company shall cooperate with any of these groups to investigate and stop any illegal robo-callers from using the Company's service to carry or process illegal calls.

When notified by the FCC's Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company's investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. The Company shall reply to any inquiry which it receives within 24 hours of notification by any and from any agency.

If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

INTERNATIONAL CALLING

Tel Tec is not currently an international voice services provider. If at any time Tel Tec decides to sell its services to international customers using North American Numbering Plan resources, Tel Tec will familiarize itself with and develop best practices for full vetting of such customers and work with its underlying provider to perform the necessary telephone number validating on all international originated calls.

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UPSTREAM PROVIDERS

Services and provisioned platforms from the upstream provider listed below provide the platform to Tel Tec, Inc. The company, as a switchless reseller, does not own its own infrastructure. And the Company is reliant upon its upstream provider for switching calls. Further the Company does not have access to the SIP header of any VoIP call.



ONGOING ROBOCALL MITIGATION

Tel Tec monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When Tel Tec and/or its underlying provider detects network usage patterns consistent with illegal robocalls or suspects illegal robocalling is taking place, Tel Tec will immediately seek to identify the party that is originating, terminating, or routing these calls and take appropriate action.

The actions taken may include, but are not limited to, initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; blocking the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

As part of Tel Tec's Plan to mitigate and prevent any originating robocalls, Tel Tec is committed to early identification and investigation of possible robocalling conditions. Among other things, with the tools and resources provided to the Company by its underlying carrier, Tel Tec watches for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. With the tools provided to the Company by its underlying provider, Tel Tec also monitors for originating calls classified as high volume short duration ("HVSD"), tracks for low call completion percentages, and/or originating calls with sequential called-to-number dialing patterns.

COMPANY DECLARATION

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If when and as the Company business may change designated Company representatives only will update this RMP as appropriate.