

Robocall Mitigation Program Description

1. Provider identification and role

Legal name: SIA TelTel
Jurisdiction of incorporation: Latvia
Primary business address:
Ropažu nov., Garkalnes pag., Garkalne, Lakstīgalu iela 4, LV-2137

We're a foreign, non-gateway intermediate provider carrying international traffic for business clients located outside the United States.

The company does not operate any facilities in the United States and does not originate calls on the US IP network. All calls destined for the United States are handed off to US-based upstream carriers who are responsible for STIR/SHAKEN authentication.

2. STIR/SHAKEN Status

The company has not implemented STIR/SHAKEN, because it does not operate on the IP portions of the US network and does not control the infrastructure required to participate in the STIR/SHAKEN ecosystem.

Under 47 CFR §64.6305, foreign non-gateway intermediate providers that do not implement STIR/SHAKEN must maintain a robocall mitigation program and certify such program in the Robocall Mitigation Database. This document satisfies that requirement.

3. Robocall Mitigation Program

3.1 Know-Your-Customer (KYC)

The company provides service only to verified business customers.

KYC procedures include:

- Verification of company registration, address, and VAT or tax ID.
- Verification of business use case and expected traffic type.
- Rejection of anonymous, unverifiable, or high-risk customers.
- Contractual prohibition on illegal robocalling and Caller ID manipulation.

3.2 Traffic Monitoring

The company continually monitors outbound traffic using:

- ASR, ACD, and short-duration patterns
- Unusual spikes in call attempts or concurrency
- Repetitive calling to narrow number ranges
- Alerts from partners identifying suspicious traffic

Traffic showing abnormal or high-risk patterns is reviewed ASAP.

3.3 Blocking and Remediation

If suspicious or potentially illegal traffic is detected:

- The company may block the traffic or suspend the customer account.
- Customers are required to provide explanations and corrective action.
- Accounts generating illegal or abusive traffic may be terminated.

The company will act without delay to prevent continued transmission of harmful traffic.

3.4 Cooperation With Traceback

The company commits to:

- Responding to traceback requests within 24 hours
- Providing accurate information about the upstream source of traffic
- Cooperating fully with the FCC, law enforcement, and the Industry Traceback Group

A dedicated email address is monitored for compliance requests.

3.5 Recordkeeping

The company maintains:

- Customer onboarding and KYC documentation
- Traffic and call detail records, subject to applicable data-retention laws
- Internal notes on investigations and mitigation actions

Records are reviewed as needed to support compliance efforts.

4. Compliance Contact

Name: Oleg Velikanov

Title: Product Manager

Email: oleg.velikanov@teltel.io

Phone: +37120031413

Address: Same as company address listed above

This contact is authorized to respond to traceback requests and compliance communications.

5. Officer Statement

I certify that this Robocall Mitigation Program accurately describes the measures implemented by SIA TelTel and that the company is committed to complying with all applicable FCC robocall-mitigation requirements.

Janis Grinbergs

CEO

19/11/2025