

Technology and Information Exchange

Robocall Mitigation Database (RMD) Filing

Primary Contact: Larry Carter

Email: noc@technology-information-ex.com

Main Office: 719-948-8090

Address: 613 E 132nd Str Burnsville, MN 55337

1. Introduction & Provider Profile

TECHNOLOGY AND INFORMATION EXCHANGE is a cloud communications and omnichannel contact center solutions provider. We deliver managed telecom services directly to enterprise clients. We do not:

- Own numbering resources (e.g., NANP blocks).
- Operate as an intermediate or wholesale transit provider.
- Originate traffic for other service providers.

All outbound traffic is terminated directly via FCC-registered, STIR/SHAKEN-implementing upstream carriers. Our core business is the provision and professional servicing of bundled communication solutions to our end-user customers.

2. STIR/SHAKEN Implementation & Call Authentication

TECHNOLOGY AND INFORMATION EXCHANGE's implementation strategy leverages our upstream carrier partners who provide numbering resources and full STIR/SHAKEN infrastructure.

- **Primary Method:** We route all outbound SIP traffic exclusively through our upstream carriers (e.g., Level 3), who apply STIR/SHAKEN attestation using the numbers they provision to us. This ensures alignment between the calling number and its legitimate subscriber.
- **Attestation Level:** Outbound calls typically receive **Partial (A-Level) Attestation** from our carriers, as they originate the call signing on our behalf.
- **Certificate Management:** TECHNOLOGY AND INFORMATION EXCHANGE does not currently hold its own SHAKEN certificates. We rely on our carrier partners' fully implemented frameworks.

3. Robocall Mitigation Practices & Caller ID Assurance

Our platform is engineered for compliance, with automated enforcement designed to prevent illegal robocalls and spoofing.

- **Caller ID Anti-Spoofing Enforcement:**
 - Caller ID presentation is strictly restricted to the specific Direct Inward Dial (DID) numbers assigned to each customer.
 - Our SIP routing logic automatically rejects any call attempt presenting an unauthorized or unassigned Caller ID.
 - Calls without a valid, presentable Caller ID are blocked.
- **Opt-In & Consent Validation:**
 - All outbound automated campaigns must be sourced from verified opt-in contact lists.
 - For most use cases, contacts are derived from confirmed web-form submissions. For regulated verticals (e.g., healthcare), we validate numbers against customer CRM records.
- **Automated Opt-Out & DNC Compliance:**
 - **IVR Opt-Out:** Every automated call includes an immediate, prominent IVR option to opt-out.
 - **SMS Opt-Out:** All provisioned DIDs are SMS-enabled. Contacts can text “STOP” to trigger an automated opt-out and addition to the customer's Do Not Call list.
 - **DNC List Enforcement:** No outbound campaign can launch without at least one active Do Not Call list applied. We support static lists, CRM integrations, and API-based National DNC Registry scrubbing.

4. Know Your Customer (KYC) & Risk Management Program

We employ a formal, multi-stage KYC program to vet and monitor all customers.

- **Customer Onboarding:**
 - Verification of legal business identity, EIN, physical address, and website.
 - Review of intended call use-case, expected volumes, and industry risk profile.
 - Mandatory execution of a compliance agreement prohibiting illegal calling.
- **Ongoing Traffic Monitoring:**
 - Continuous analysis for anomalies (e.g., sudden volume spikes, short call durations).

- Monitoring of carrier spam feedback loops and industry complaint data.
- Internal data analytics are used to flag high-risk patterns for review.
- **Remediation & Enforcement:**
 - Traffic identified as suspicious is subject to immediate blocking, suspension, or service termination.
 - We do not currently employ third-party analytics vendors; all monitoring is conducted internally.

5. Traceback & Law Enforcement Cooperation

TECHNOLOGY AND INFORMATION EXCHANGE is committed to full and prompt cooperation with all official investigative bodies. We respond to traceback requests from:

- USTelecom's Industry Traceback Group (ITG)
- The FCC Enforcement Bureau
- Federal and State Law Enforcement Agencies

We provide necessary call detail records (CDRs) in accordance with lawful requests and industry timelines.

6. Summary Attestation

- TECHNOLOGY AND INFORMATION EXCHANGE originates traffic only for its own directly serviced enterprise customers.
- All customers are subject to mandatory KYC verification and continuous compliance monitoring.
- Any violation of our acceptable use policy results in immediate service suspension or termination.

7. Contact for Legal & Regulatory Inquiries

For all matters related to traceback, law enforcement, regulatory actions, or abuse reporting:

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