

Technology Solutions Team LLC

Robocall Mitigation Plan

Introduction

The purpose of this document is to outline and detail the steps taken to block illegal robocall traffic as part of our robocall mitigation program. Technology Solutions Team ("TST") operates as a voice service provider of telecommunications services. However, as a "service provider" TST does not operate or control the SIP signaling, routing infrastructure, or STIR/SHAKEN authentication systems ("Upstream Functions"). Instead, these functions are performed by TST's primary upstream service provider, [REDACTED] ("USP"), which is a registered and compliant facilities-based carrier in the FCC Robocall Mitigation Database.

TST's role in providing telecommunication services to users is limited to provisioning services for customers and ensuring that its customers are complying with the FCC rules and regulations in regard to their use of services provided by TST as outlined in its user agreement. TST does not originate robocall campaigns and does not permit customers to use its services for unlawful automated calling.

STIR/SHAKEN Deployment Status

- TST is not required to implement STIR/SHAKEN because it does not operate its own switching or signaling infrastructure. All signing is performed by [REDACTED] TST's USP, which has fully implemented STIR/SHAKEN to perform call signing and verification for all traffic that TST's clients originate.
- As a voice service reseller, TST takes reasonable steps to ensure that all outbound calls are passed to its USP for STIR/SHAKEN authentication and that no configurations bypass authentication.
- The USP is responsible for call authentication, attestation scoring, and monitoring tools which are not provided by TST, but are a needed component of the robocall mitigation framework.

Customer Vetting & Onboarding Procedures

In accordance with FCC rules (47 C.F.R. § 64.6305) for robocall mitigation, TST conducts commercially reasonable customer vetting, including Know-Your-Customer (KYC) procedures, prior to enabling outbound calling. This includes verification of the customer's legal business name, physical address, business registration (if applicable), and stated use of services. TST performs fraud-risk checks, including validation of submitted information and screening for indicators of high-risk or unlawful calling activity. Accounts are denied or suspended if information cannot be verified or presents fraud or robocall risk.

Service Agreement Enforcement & Termination

The TST Service Agreement prohibits:

- Autodialing, robocalling, spoofing, spam calling, or any activity in violation of FCC regulations or applicable laws
- Misuse of telephone numbers or call origination services

Termination Clause: Our Service Agreement incorporates FCC rules under 47 C.F.R. Part 64, including §64.6305, and prohibits any customer activity that would violate these provisions. TST reserves the right to immediately suspend or terminate any account reasonably suspected of engaging in prohibited activities, without prior notice, and to block traffic linked to illegal robocall campaigns.

Traceback Compliance

TST fully cooperates with the Industry Traceback Group (ITG), FCC, and law enforcement by:

- Responding to traceback inquiries within 24 hours.
- Providing account and call record information (as allowed by law).
- Taking immediate remedial action, including suspension or termination of implicated accounts.

Ongoing Compliance

TST will maintain and update its Robocall Mitigation Plan to remain in compliance with all applicable laws and FCC regulations (47 C.F.R. § 64.6305). TST will promptly update the plan if FCC rules, internal procedures, or upstream provider requirements change.

This certification and plan are submitted under penalty of perjury pursuant to 47 C.F.R. §64.6305.

Company Name: Technology Solutions Team LLC

Primary Contact: Director of Technology - Timothy Fullard-Leo

Address: 4800 NW Camas Meadows Drive

Suite 200

Camas, WA 98607

Email: notice@technologysolutionsteam.com

Phone: (360) 889-8326



Timothy Fullard-Leo