

March 25, 2026

Robocall Mitigation Plan (RMP)

I. Overview

The FCC requires that all providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. Those not yet fully compliant must implement and certify to the implementation of a Robocall Mitigation Plan to ensure that this illegal traffic does not originate on their networks as they work within the industry to become fully compliant. The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- ☐ details the reasonable steps taken to avoid originating illegal robocalls
- ☐ demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- ☐ is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of TR Com Services Inc., who is a small reseller of voice over IP services to small businesses in the Canadian market. TR Com Services Inc. resells the services that SkySwitch provides, who has implemented the STIR/SHAKEN strategy in their network.

II. General Prohibition Against Illegal Robocalling

TR Com Services Inc. end user services are subject to restrictions contained in its legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements. Soon to be updated. Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

Robocall Mitigation Policy

- ☐ providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call:
 - ☐ violating any applicable local, state, or federal law; using the TR Com Services Inc. service to engage in or in connection with fraudulent activities
- In addition, the company is updating its TOS to expressly reference the prohibition on robocalling and all current subscribers will receive notice of the publication of its updated TOS.

TR Com Services Inc.’s end users are notified that TR Com Services Inc. may take action up to suspension or termination of service for violation of the TOS.

III. Know Your Customer

TR Com Services Inc. utilizes the mitigation technique of “Know Your Customer.” TR Com Services Inc. is a small reseller that maintains a close relationship with its subscribers. Its customers are generally small business users with very small traffic volume traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

TR Com Services Inc. has set a call path level based on its average customer size. The level – referred to as “large volume calling capability” – is subject to change.

TR Com Services Inc. has a screening for new customers requesting service at or above large volume calling capability levels:

- ☐ We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- ☐ Businesses requesting large volume calling capability, We will not deploy unless we review the nature of the business
- ☐ We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- ☐ TR Com Services Inc does visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

TR Com Services Inc serves a small number of long-time business end users with small volume calling capability that are being directly contacted to review with them TR Com Services Inc policies and efforts to prevent the TR Com Services Inc network from being used for illegal robocalling.

IV. Network Monitoring

TR Com Services Inc continues to review monitoring of traffic and will flag call patterns indicative of potential illegal robocalling. Additional capability will be added in the future which will automatically disable any subscribers associated with flagged call patterns.

V. Traceback and Enforcement Cooperation

TR Com Services Inc. will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. CWT will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

Conclusion:

The **Robocall Mitigation Plan (RMP)** for TR Com Services Inc. is designed to comply with the **TRACED Act** and **STIR/SHAKEN** regulations, aiming to significantly reduce robo calls and caller ID spoofing on the company's network. By implementing these measures, TR Com Services Inc. committed to providing a safer and more reliable communication experience for its customers.