

Robocall Mitigation Program Description

47 CFR § 64.6305 Compliance

1. Company Identification

Legal Entity Name: Talk America VoIP LLC

Business Address:

1001 South Main Street, STE 600
Kalispell, MT 59901

Phone: (406) 260-0552

Compliance / Legal Contact Email: legal@talkamericavoip.org

Type of Provider:

Wholesale and intermediate VoIP service provider offering U.S. domestic VoIP termination, SIP trunking, and interconnection services to licensed carriers, enterprises, and direct call center customers.

2. Scope and Purpose of the Robocall Mitigation Program

Talk America VoIP LLC (“the Company”) has implemented this Robocall Mitigation Program (“RMP”) in accordance with **47 CFR § 64.6305** to prevent the origination, carriage, or termination of illegal robocalls on the U.S. telephone network.

The purpose of this program is to:

- Prevent illegal, fraudulent, or abusive robocalling activity
- Detect and mitigate suspicious calling behavior
- Ensure compliance with FCC, TCPA, and industry standards
- Protect consumers and the integrity of the PSTN
- Cooperate fully with traceback and regulatory authorities

This program applies to **all voice traffic** carried on the Company’s network, including domestic and international-originated traffic that terminates to U.S. destinations.

3. STIR/SHAKEN Status and Regulatory Basis

Talk America VoIP LLC qualifies for an exemption under **47 CFR § 64.6304(a)(2)** as an **intermediate and non-originating voice service provider**.

Key Characteristics:

- The Company does **not originate end-user traffic**
- Calls are authenticated and signed by downstream originating service providers
- The Company does not assign or control end-user calling numbers (ANI/CLI)
- The Company lacks the subscriber identity data required to perform accurate call authentication

In compliance with FCC rules, the Company has implemented **alternative robocall mitigation measures**, as required for exempt providers.

4. Customer Onboarding, Vetting, and Due Diligence

Talk America VoIP LLC enforces strict onboarding procedures before activating any customer or interconnection.

Required Customer Information:

- Legal business name and registration documents
- Physical business address
- EIN / tax identification (where applicable)
- FCC Registration Number (FRN)
- FCC Form 499A filing confirmation
- Operating authority or carrier licenses (if applicable)
- Description of traffic type and use case
- Sample calling numbers and number ownership documentation
- Signed service agreement with robocall compliance clauses

Risk Assessment:

Customers are classified as **low-, medium-, or high-risk** based on:

- Traffic profile (duration, volume, campaign type)
- Business model (enterprise, wholesale, call center)
- History of complaints or enforcement actions
- Geographic origination patterns

High-risk customers are subject to enhanced monitoring or may be rejected.

5. Prohibited Traffic and Use Policies

The following traffic is strictly prohibited on the Company's network:

- Illegal robocalls or auto-dialed calls without consent
- Spoofed or unauthorized caller ID
- Scam, fraud, or phishing campaigns
- Traffic violating TCPA, FCC, or state laws
- Unauthenticated traffic where authentication is required
- Traffic designed to evade analytics or traceback

Violations result in immediate suspension or termination.

6. Network Monitoring and Traffic Analysis

The Company continuously monitors traffic using real-time and historical analytics, including:

- Call volume spikes
- Short-duration call patterns
- High ASR / low ACD anomalies
- Repetitive calling behavior
- High call attempts per ANI
- Abnormal post-dial delay behavior

Automated alerts are generated when thresholds are exceeded.

7. Investigation and Enforcement Procedures

When suspicious traffic is detected:

- 1. Immediate Review**

Traffic logs and CDRs are reviewed by compliance personnel.

- 2. Customer Notification**

The customer is contacted for explanation and documentation.

- 3. Mitigation Actions**

- Rate limiting
- Call blocking
- ANI or route suspension
- Full account suspension or termination

- 4. Escalation**

Unresolved issues are escalated to management and legal review.

8. Traceback Cooperation

Talk America VoIP LLC fully cooperates with:

- **Industry Traceback Group (ITG)**
- **STI-PA and USTelecom**
- **FCC and law enforcement agencies**

Traceback requests are acknowledged promptly, and requested data is provided in a timely manner.

9. Recordkeeping and Audit Readiness

The Company maintains records including:

- Customer onboarding documents
- Signed agreements
- Traffic logs and CDRs

- Investigation and enforcement actions
- Traceback correspondence

Records are retained for a minimum of **24 months**.

10. Staff Training and Internal Controls

Relevant staff receive periodic training on:

- Robocall compliance requirements
- FCC and TCPA obligations
- Traffic monitoring procedures
- Incident escalation protocols

Access to network and customer systems is role-based and logged.

11. Third-Party Interconnections and Wholesale Traffic

For wholesale and carrier interconnections, the Company:

- Requires counterparties to certify compliance
 - Enforces call signing responsibility at origination
 - Monitors inbound traffic quality
 - Terminates relationships with non-compliant partners
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12. Continuous Improvement and Review

The Robocall Mitigation Program is reviewed periodically and updated to reflect:

- FCC rule changes
 - Industry best practices
 - Emerging fraud trends
 - Network or business model changes
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13. Certification

Talk America VoIP LLC certifies that this Robocall Mitigation Program is actively enforced and accurately reflects its operational practices. The Company understands that false or misleading statements may subject it to enforcement action under federal law.