

# Robocall Mitigation Plan

This robocall mitigation plan is for Office Tech Providers Corporation (dba Teklink) with headquarters at 1 Paragon Drive, Montvale, NJ 07645.

We perform the following roles in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- We have two VoIP Hosted partners; Skyswitch (RMD0002940), which we resell, and 2600Hz/Kazoo (RMD0002004).
- Our downstream carrier is Trunking.io (RMD0026674).

Office Tech Providers Corporation, nor any of our executives or principals, have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations.

We use the affirmative and effective measures detailed below to prevent the origination or transit of illegal robocalls.

## Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

## Traceback

We respond to all traceback requests from the Commission, law enforcement, and the registered traceback consortium within 24 hours and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

## STIR/SHAKEN

Our OCN is 099M. We use Telonium as our STI-CA and delegate our certificate to Tunking.io to sign all calls originating on our Kazoo network. We resell Skyswitch and they perform all STIR/SHAKEN functions on their network equipment for our customers provisioned on the Skyswitch platform.

All the voice traffic that originates on our network is subject to the robocall mitigation program described below.

## Robocall Mitigation Program

We rely on software provided by our carrier partners to monitor our outbound voice traffic in real time to prevent the origination of illegal robocalls.

Combining behavioral analytics, caller authentication and verification, our solution features:

- **Fraud Detection:** Detection of high volume robocalling, spoofing and spam call activity.
- **Subscriber Notification:** Caller ID Name override to warn subscribers of suspicious calls.
- **Call Blocking Support:** Accurate identification enabling you to block fraudulent phone calls as per the TRACED Act (2019)

- **Business Number Verification:** Register legitimate business numbers to prevent unintentional call blocking.
- **Caller ID Name Service:** Easy integration of Caller ID name lookup service, including robocall mitigation with override to include original caller ID even when call is determined fraudulent.
- **Do Not Call Registry:** We comply with the FTC's rules for the Do Not Call Registry.
- **Do Not Originate:** Our Hosted partners scrub originating calls with a national Do Not Originate list per FCC's guidelines.

In addition, we have implemented a Call Abuse Policy and have published the following policy to our web site, terms of use, and have notified our customers of the policy as copied below:

*"Any call originated on Office Tech Providers Corp., dba Teklink, network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from Office Tech Providers Corp., dba Teklink's network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court."*