



1. Provider identification and scope

- **Company name:** Telepathy Networks, LLC
 - **Service type:** Interconnected VoIP provider and hosted PBX reseller using CoreDial as an upstream carrier for PSTN connectivity and STIR/SHAKEN.
 - **Network role:** Originating and terminating voice service provider for enterprise and SMB customers; does not control SIP interconnects to the PSTN and does not operate its own STIR/SHAKEN implementation.
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2. Robocall mitigation program overview

Under 47 C.F.R. § 64.6305, Telepathy Networks LLC implements a robocall mitigation program designed to take **reasonable steps** to avoid originating illegal robocall traffic, respond to traceback requests within 24 hours, and cooperate with law enforcement and the industry traceback consortium.

As a reseller without direct control over STIR/SHAKEN signing, the program focuses on: strong Know Your Customer (KYC), call-traffic monitoring and analytics, contractual controls, and rapid response to complaints and tracebacks.

3. Know Your Customer (KYC) procedures

Telepathy Networks LLC applies the following KYC measures to all new and existing voice customers:

- **Customer identity verification**
 - Collect and verify legal name, address, corporate registration, and tax ID (EIN).
 - For businesses, obtain proof of business (articles of incorporation, state registration, or equivalent).
 - Screen customers against publicly available enforcement lists (e.g., FCC/FTC enforcement actions when practical).
- **Service use case review**



- Require a written description of how the customer will use outbound calling (e.g., support desk, appointment reminders, internal office use).
 - Prohibit outbound telemarketing or high-volume dialing campaigns unless specifically approved and documented.
 - **Caller ID and number assignment controls**
 - Only permit caller ID values that are assigned to the customer by Telepathy Networks LLC or that the customer proves they are authorized to use.
 - Maintain a whitelist of approved caller IDs per customer; block use of unapproved caller IDs at the platform level where technically feasible.
 - **Risk-based onboarding**
 - Apply enhanced review for high-risk verticals (lead generation, debt relief, short-duration outbound campaigns, etc.).
 - Reserve the right to deny service or restrict outbound calling for customers that present elevated robocall risk.
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4. Call traffic monitoring and analytics

Telepathy Networks LLC actively monitors customer traffic patterns to detect and mitigate suspected illegal robocalls.

- **Traffic pattern monitoring**
 - Review call detail records (CDRs) for anomalous patterns: extremely short call durations, very high calls-per-second, unusual international traffic, or sudden spikes in volume.
 - Flag and review customers whose traffic shows characteristics consistent with illegal robocalling.
- **Thresholds and alerts**
 - Establish internal thresholds for maximum calls-per-second and total daily calls per endpoint or trunk; exceedance triggers review and potential temporary limits.



- Apply tighter limits to newly onboarded or higher-risk customers during an initial observation period.
 - **Blocking or restricting traffic**
 - When traffic is suspected to be illegal or harmful, Telepathy Networks LLC may immediately:
 - Block specific caller IDs or destinations.
 - Rate-limit outbound calls.
 - Temporarily suspend service pending investigation.
 - Confirmed illegal robocallers are terminated under the terms of service and reported to appropriate authorities as required.
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5. Complaint handling and traceback cooperation

Telepathy Networks LLC commits to respond to all traceback requests from the FCC, law enforcement, and the registered industry traceback consortium **within 24 hours**, as required by § 64.6305.

- **Traceback process**
 - Designate a compliance contact (name, email, and phone) responsible for handling traceback requests.
 - Maintain records sufficient to identify the upstream provider and downstream customer involved in each call path.
 - Upon receiving a traceback, investigate the relevant traffic, identify the customer, and take appropriate mitigation steps (warnings, blocking, suspension, or termination).
 - **End-user complaints**
 - Provide a public email address or form for robocall complaints.
 - Investigate each complaint, review CDRs and call recordings if available, and document actions taken.
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6. Upstream provider management (CoreDial or others)

Because Telepathy Networks LLC does not directly interconnect to the PSTN, it relies on upstream carrier(s) for call termination, call origination, and STIR/SHAKEN implementation.

- **Selection and oversight**
 - Use only upstream providers that:
 - Are listed in the FCC Robocall Mitigation Database, and
 - Have their own STIR/SHAKEN implementation and robocall mitigation plans on file.
 - Periodically verify upstream providers' RMD status and review public information about their mitigation practices.
- **Contractual commitments**
 - Require upstream providers, via contract where possible, to:
 - Implement STIR/SHAKEN for calls originated on Telepathy Networks, LLC's behalf when technically feasible.
 - Maintain a robocall mitigation program consistent with FCC rules.
 - Cooperate with traceback investigations.

7. Customer terms of service and enforcement

- **Prohibited uses**
 - Terms of service explicitly prohibit:
 - Initiating illegal robocalls or any calls in violation of the TCPA, TSR, or applicable state laws.
 - Spoofing caller ID with numbers the customer does not own or have authority to use.
- **Enforcement**
 - Telepathy Networks LLC reserves the right to:



- Suspend or terminate service for customers engaged in illegal or abusive calling practices.
- Block specific traffic patterns or destinations when necessary to prevent illegal robocalls.
- Enforcement steps are documented for each incident and retained for audit purposes.

8. Ongoing review and program updates

Telepathy Networks LLC will periodically review and update this robocall mitigation program to reflect changes in FCC rules, industry best practices, and upstream provider capabilities.

At least annually, Telepathy Networks LLC will reassess its KYC procedures, monitoring thresholds, and complaint-handling practices and update its Robocall Mitigation Database filing as required.