
Togami Voice LLC

Robocall Mitigation Plan

Version 1.0

Effective Date: January 2026

1. Company Information

Legal Name: Togami Voice LLC

Business Type: Voice Service Provider (VoIP / UCaaS)

Services Offered: SIP Trunking, Hosted Voice, Unified Communications

Service Area: United States

Regulatory Authority: Federal Communications Commission (FCC)

Togami Voice LLC (“Togami”) provides interconnected VoIP services and is committed to preventing the origination and transit of illegal robocalls on its network in accordance with FCC regulations, including 47 CFR §64.6305.

2. Purpose of This Plan

The purpose of this Robocall Mitigation Plan is to document the policies, procedures, and technical controls Togami Voice LLC uses to:

- Prevent illegal robocalls
- Detect suspicious calling behavior
- Respond to abuse and traceback requests
- Comply with FCC STIR/SHAKEN and RMD requirements

This plan is maintained and updated as required and is filed in the FCC Robocall Mitigation Database.

3. STIR/SHAKEN Implementation

Togami Voice LLC has implemented STIR/SHAKEN across its voice network.

Attestation Levels:

- **A (Full Attestation):** For verified customers where Togami has authenticated the customer and controls the calling number.
- **B (Partial Attestation):** For customers known to Togami but where number ownership cannot be fully verified.
- **C (Gateway Attestation):** For calls received from upstream providers where Togami cannot verify the caller.

Technical Implementation:

Togami uses certified STIR/SHAKEN service providers and digital certificates from authorized STI-CA vendors to sign outbound calls and verify inbound calls.

4. Traffic Monitoring and Analytics

Togami actively monitors voice traffic for abnormal or suspicious patterns including:

- High volume outbound call spikes
- Sequential dialing
- Short call duration patterns
- High Answer-Seizure Ratios (ASR)
- Repeated calls to invalid or unassigned numbers

Monitoring Methods:

- Real-time call detail record (CDR) analysis
 - Threshold-based alerts
 - Automated fraud detection rules
 - Manual review by network operations staff
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5. Customer Vetting and Onboarding (KYC)

All customers undergo Know Your Customer (KYC) verification prior to service activation.

Vetting includes:

- Legal business name and registration

- Physical address verification
- Government-issued ID for principals
- Intended use of service
- Acceptance of Togami's Acceptable Use Policy (AUP)

High-risk use cases such as outbound dialing campaigns or call centers require enhanced due diligence and written approval.

6. Prohibited Use

Togami strictly prohibits:

- Robocalling without consumer consent
- Telemarketing without proper compliance (TCPA)
- Spoofing caller ID
- Scam, fraud, or phishing campaigns
- Traffic pumping or artificial call generation

These activities are grounds for immediate suspension or termination.

7. Abuse Detection and Response

Togami maintains a formal abuse response process.

When suspicious activity is detected:

1. Traffic is investigated within 24 hours
 2. Customer is notified and required to explain usage
 3. Calls may be rate-limited or blocked
 4. Service may be suspended or terminated
 5. Incident is documented
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8. Industry Traceback Cooperation

Togami fully cooperates with:

- **USTelecom Industry Traceback Group (ITG)**
- FCC enforcement requests
- Upstream carrier investigations

Response commitments:

- Traceback requests acknowledged within 24 hours
- Full call records provided when legally permitted
- Abusive customers disconnected when confirmed

9. Call Blocking and Reputation Management

Togami utilizes third-party call reputation and analytics providers to:

- Score calls for spam likelihood
- Block known scam sources
- Label suspicious calls
- Integrate with carrier-level blocking frameworks

10. Recordkeeping and Reporting

Togami retains:

- Call detail records (CDRs)
- Abuse complaints
- Investigation notes
- Customer onboarding records

Records are retained for a minimum of **24 months** in compliance with FCC guidelines.

11. Compliance Officer

Designated Compliance Officer:

Title: Regulatory Compliance Manager

Company: Togami Voice LLC

Email: compliance@togamivoice.com

The Compliance Officer is responsible for:

- Maintaining this plan
 - Filing updates in the FCC RMD
 - Annual compliance certification
 - Coordinating audits and investigations
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12. Enforcement and Review

This plan is:

- Reviewed annually
- Updated as regulations evolve
- Enforced across all Togami operations

Failure to comply with this plan by employees, partners, or customers may result in disciplinary action, service suspension, or termination.

13. Certification Statement

Togami Voice LLC certifies that it has implemented the robocall mitigation practices described in this plan and that the information provided in the FCC Robocall Mitigation Database is accurate and complete to the best of its knowledge.

Optional Addendum (Recommended)

You can strengthen this for carriers by adding:

- List of fraud tools/vendors used
- Network diagram (internal only)
- Incident response SLA

- Customer risk scoring model
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