

Tech Turnaround

Robocall Mitigation Program Description

Prepared to Comply with 47 CFR § 64.6305(d)(2)(ii)-(iii)

1. Company Overview

Tech Turnaround is a U.S.-based managed IT services provider offering business communications solutions, including hosted VoIP and unified communications services, to business customers in the United States. Tech Turnaround utilizes CoreDial as its underlying VoIP network and SIP trunk provider. Tech Turnaround does not originate mass outbound calling campaigns, telemarketing traffic, or high-volume auto-dialer traffic. Services are provisioned exclusively for vetted business customers.

2. STIR/SHAKEN Implementation Status

Tech Turnaround relies on its upstream provider, CoreDial, for implementation of STIR/SHAKEN call authentication and attestation. CoreDial is responsible for implementing STIR/SHAKEN authentication on outbound calls where technically feasible, validating inbound calls using STIR/SHAKEN protocols, and maintaining authentication certificates and compliance with FCC rules. Tech Turnaround does not directly manage its own STI certificates and relies on its upstream carrier's authentication framework.

3. Robocall Mitigation Program (47 CFR § 64.6305(d)(2)(ii))

Tech Turnaround has implemented a robocall mitigation program designed to prevent the origination of illegal robocalls and mitigate suspected unlawful traffic. Customer Vetting and Onboarding Controls: - Service provided only to verified business customers - Customer identity verification prior to activation - Business registration and EIN documentation collected where applicable - Screening against known enforcement databases when appropriate - Prohibition of high-risk industries commonly associated with illegal robocalling Acceptable Use Policy: - Prohibits illegal robocalling - Prohibits unlawful caller ID spoofing under the TRACED Act - Requires compliance with TCPA and FCC regulations - Violations result in suspension, termination, and reporting if required Traffic Monitoring and Analytics: - Monitoring for abnormal call volume spikes - Detection of short-duration call bursts - Identification of predictive dialing patterns - Review of high unanswered call ratios - Investigation of suspicious traffic patterns - Temporary suspension or termination where abuse is confirmed Upstream Coordination: - Cooperation with traceback requests - Prompt response to FCC enforcement inquiries - Blocking of traffic when directed by upstream carriers - Implementation of mitigation directives as required

4. Compliance Affirmation (47 CFR § 64.6305(d)(2)(iii))

Tech Turnaround affirms that it has implemented a robocall mitigation program reasonably designed to prevent the origination of illegal robocalls. The program includes monitoring, enforcement, and mitigation procedures. The company will respond fully and promptly to traceback requests and cooperate with federal and state law enforcement investigations. The mitigation program will be updated as regulatory requirements evolve.

5. Recordkeeping

Tech Turnaround maintains records of customer onboarding documentation, traffic monitoring logs, enforcement actions taken, and traceback responses. Records are retained in accordance with FCC requirements and industry best practices.

6. Ongoing Review

This Robocall Mitigation Program is reviewed annually and updated as necessary to maintain compliance with applicable FCC rules, the TRACED Act, and STIR/SHAKEN framework requirements.