

ROBOCALL MITIGATION PROGRAM

CommTech Systems, Inc.

Company Name: CommTech Systems, Inc.

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1. Company Overview

CommTech Systems, Inc. operates as a reseller of hosted voice and telecommunications services. CommTech Systems does not own, operate, or control voice switching equipment, session border controllers (SBCs), or call routing infrastructure.

All voice services resold by CommTech Systems are hosted, operated, and technically managed by its upstream carrier, ioTran / Talking Platforms USA.

CommTech Systems does not originate voice traffic directly and does not modify caller identification or signaling information.

2. Role as a Reseller

CommTech Systems provides sales, customer onboarding, billing, and customer support for hosted voice services. All network operations and voice traffic management functions are performed exclusively by ioTran / Talking Platforms USA.

ioTran / Talking Platforms USA is responsible for:

- Call origination and termination
- Network operations and routing
- STIR/SHAKEN implementation
- Robocall mitigation controls
- Traffic monitoring and analytics

- Enforcement actions related to suspicious or unlawful calling activity

CommTech Systems does not have administrative or technical access to modify or bypass these controls.

3. STIR/SHAKEN Implementation

STIR/SHAKEN authentication and verification are fully implemented and maintained by ioTran / Talking Platforms USA within its hosted voice network.

ioTran / Talking Platforms USA is responsible for:

- Signing outbound calls
- Verification of inbound call authentication
- Assignment of attestation levels
- Maintaining compliance with FCC STIR/SHAKEN requirements

CommTech Systems relies on the upstream provider's implementation and does not independently perform call authentication functions.

4. Robocall Mitigation Measures

All robocall mitigation measures are implemented and enforced by ioTran / Talking Platforms USA. These measures include, but are not limited to:

- Automated monitoring of call traffic
- Detection of abnormal calling patterns
- Caller ID validation and spoofing prevention
- Blocking or suspension of suspicious traffic
- Enforcement of acceptable use policies

- Cooperation with industry traceback requests

CommTech Systems does not directly monitor or control call traffic.

5. Customer Acceptable Use Policy

CommTech Systems requires customers to comply with all applicable federal and state telecommunications laws, including restrictions on illegal robocalling, caller ID spoofing, and automated calling without proper consent.

Customers are informed that violations may result in immediate suspension or termination of services by ioTran / Talking Platforms USA or its upstream partners.