



TELCOM DATA, LLC.

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Company Background

Telcom Data, LLC is a small, California -based, reseller. of Voice over IP service to small businesses and sole proprietors.

Telcom Data, LLC has fewer than fifty (50) voice subscriber lines, and fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304. All voice traffic originating from our servers are subject to provisions of this RMP.

"Know Your Customers" (KYC)

All Telcom Data, LLC Voice clients come from direct or personal referral. It therefore is able to vet its customers before activating new service or implementing changes to existing service. Telcom Data, LLC collects valid government-issued identification and business documentation for all new customers, reviews the intended use case for telephony services, and screens for potential risk factors associated with illegal robocall activity.

Additionally, Telcom Data, LLC primarily serves small professional offices (e.g., attorneys, consultants, sole proprietorships, and other small businesses) whose industries and business models inherently preclude high-volume outbound calling. We take into account the nature of the client's industry when assessing risk and suitability for voice service.

Telcom Data, LLC does not provide or permit any software platforms, dialer systems, or API integrations that would enable predictive dialing, mass robocalling, or similar high-volume outbound calling applications. If a customer sought to deploy such functionality, Telcom Data, LLC would refuse to support or allow it on our network.

Additionally, Telcom Data, LLC does not resell wholesale VoIP services and prohibits its customers from reselling services or providing downstream access that could enable robocall origination

STIR/SHAKEN

Telcom Data, LLC has partnered with an upstream carrier as the sole provider for all inbound and outbound traffic for our servers. Our upstream carrier is approved by the STI-PA and verifies inbound identity headers while providing attestation for all outbound calls.

Our clients' outbound Caller IDs are configured on our servers in accordance with STIR/SHAKEN guidelines to facilitate proper attestation by our upstream carrier.

Attestation and Complaints

All DID's in use for outbound caller ID reside with our carrier, and therefore will receive "A" level attestation by our carrier. In addition, none of our traffic could be qualified as High Volume Short Duration (HVSD). Telcom Data, LLC has not been the subject of any vendor or Traceback complaints regarding fraudulent activity. Traceback and Enforcement

Telcom Data, LLC acknowledges the FCC's expectation for timely cooperation and promptly responds to traceback requests within one business day, and immediately investigates and mitigates any identified unlawful robocalling activity.

All clients have been informed of the regulations prohibiting unlawful robocalls. If we receive credible evidence — such as notification from the Industry Traceback Group, law enforcement, or other authorized sources — indicating that a customer has originated such calls, we will suspend or terminate their service in accordance with our policy. Telcom Data, LLC reviews its robocall mitigation policies at least annually, or sooner if FCC rules change. All enforcement actions are documented and retained as part of Telcom Data, LLC's compliance records for at least 2 years.

Audit and Monitoring

Telcom Data, LLC relies on a combination of internal review and ongoing monitoring appropriate to its size and customer profile, with additional support from our upstream carrier to detect and mitigate unlawful robocalling activity. Our upstream carrier provides automated notifications if any account exhibits traffic characteristics associated with illegal robocalls, such as unusually high volumes of short-duration calls (e.g., calls under 6 seconds) or abnormal calling patterns.

We monitor customer traffic with a focus on call duration trends, call completion ratios, and call-per second (CPS) rates. The following are considered potential indicators of suspicious activity

- High short-duration call volumes (e.g., a large percentage of calls under 6 seconds)
- Abnormal Answer Seizure Ratios (ASR) exceeding 70%
- Call-per-second rates greater than 1 CPS
- Sequential dialing patterns targeting large number blocks

Any account that exceeds these thresholds, or is otherwise flagged for unusual activity, is subject to immediate review and investigation. We suspend or terminate service promptly if we confirm activity consistent with unlawful robocalls.

Robocall Mitigation Contact

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