

# ROBOCALL MITIGATION PLAN

## TEL TRUNK LLC

**Headquarters:** 265 Davidson Ave, Suite 110, Somerset, NJ 08873

**FRN:** 0038103586

**Effective Date:** March 3, 2026

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## 1. Company Overview

**TEL TRUNK LLC** ("TEL TRUNK") is a facilities-based and non-facilities-based telecommunications service provider offering VoIP, SIP trunking, and wholesale voice termination services. The company provides domestic and international voice services to enterprise clients, resellers, and carriers.

TEL TRUNK is committed to full compliance with the regulations established by the Federal Communications Commission (FCC), including but not limited to:

- 47 CFR § 64.6301 (Robocall Mitigation Requirements)
  - STIR/SHAKEN Implementation Requirements
  - FCC Robocall Mitigation Database Certification Requirements
  - TRACED Act Compliance Obligations
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## 2. STIR/SHAKEN Implementation Status

TEL TRUNK has implemented the STIR/SHAKEN framework in accordance with FCC mandates.

### 2.1 Authentication Policy

- All IP-based outbound traffic capable of being authenticated is signed using STIR/SHAKEN protocols.

- TEL TRUNK utilizes authorized STI Certification Authorities and Policy Administrators.
- Calls are signed at the highest level of attestation permitted (A, B, or C) based on direct customer relationships and verification status.

## 2.2 Attestation Standards

- **Full Attestation (A):** Assigned where TEL TRUNK has a direct authenticated relationship with the end-user and verified caller ID control.
  - **Partial Attestation (B):** Assigned where customer identity is known but caller ID control cannot be fully verified.
  - **Gateway Attestation (C):** Assigned for inbound international or third-party traffic where direct authentication is not feasible.
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# 3. Robocall Mitigation Framework

TEL TRUNK maintains a multi-layered robocall mitigation strategy combining preventive, detective, and corrective controls.

## 3.1 Customer Due Diligence (CDD)

Prior to service activation, TEL TRUNK conducts:

- Corporate formation verification
- EIN and business registration validation
- OFAC and sanctions screening
- Traffic use-case declaration review
- Verification of ownership and authorized signatories
- Know Your Customer (KYC) documentation review
- Review against high-risk industry categories

Accounts are not activated without full compliance clearance.

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### **3.2 Traffic Monitoring & Analytics**

TEL TRUNK deploys advanced traffic monitoring systems designed to identify:

- High short-duration call ratios
- Abnormal call velocity spikes
- Sequential or invalid number dialing patterns
- Excessive call attempts with low answer-seizure ratio (ASR)
- Traffic targeting known Do-Not-Originate (DNO) lists
- Reassigned number misuse

Traffic is continuously analyzed using real-time and historical analytics engines.

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### **3.3 Call Blocking & Mitigation Controls**

TEL TRUNK reserves the right to:

- Immediately suspend traffic suspected of illegal robocalling
  - Block calls to DNO-listed numbers
- Block traffic associated with traceback notifications
- Rate-limit high-risk accounts pending investigation
- Permanently terminate non-compliant customers

Zero tolerance is maintained for:

- Spoofed caller ID

- IRS/government impersonation scams
    - Auto warranty scams
    - SSN fraud campaigns
  - Phishing and social engineering campaigns
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## 4. Traceback Cooperation & Response Protocol

TEL TRUNK fully cooperates with traceback requests initiated by:

- The FCC
- Law enforcement agencies
- Industry traceback consortiums
- Upstream and downstream carriers

### 4.1 24-Hour Mandatory Response Policy

TEL TRUNK maintains a strict internal policy requiring:

- Acknowledgment of all traceback requests within **24 hours**
- Complete investigation and documented findings within regulatory timeframes
  - Immediate mitigation where illegal traffic is identified

Failure by customers to cooperate during traceback investigations results in immediate suspension or termination.

No exceptions are permitted under this policy.

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## 5. Record Retention & Documentation

TEL TRUNK maintains comprehensive records for a minimum of two (2) years, including:

- Customer onboarding documentation
  - Traffic usage logs
- STIR/SHAKEN authentication logs
  - Attestation records
- Traceback correspondence
- Enforcement actions taken

Records are securely stored and made available to regulatory authorities upon lawful request.

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## **6. Upstream & Downstream Partner Compliance**

TEL TRUNK requires all upstream providers and downstream customers to:

- Confirm participation in the FCC Robocall Mitigation Database (if applicable)
  - Implement STIR/SHAKEN where technically feasible
- Maintain robocall mitigation policies consistent with FCC requirements

Contracts include representations and warranties prohibiting illegal robocall traffic.

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## **7. Governance & Compliance Oversight**

TEL TRUNK has designated a Robocall Compliance Officer responsible for:

- Regulatory monitoring
- Policy enforcement
- Internal audits

- Traceback coordination
- FCC correspondence management

Quarterly compliance reviews are conducted to ensure:

- Continued regulatory adherence
- Effectiveness of mitigation controls
- Ongoing refinement of fraud detection systems

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## 8. Certification Statement

TEL TRUNK certifies that:

- It has fully implemented STIR/SHAKEN for IP-based voice traffic where required.
- It maintains an active robocall mitigation program to prevent the origination and transmission of illegal robocalls.
  - It responds to traceback requests within 24 hours without exception.
  - It complies with all applicable FCC rules under 47 CFR § 64.6301.

This Robocall Mitigation Plan is submitted in good faith for inclusion in the FCC Robocall Mitigation Database.

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### Authorized Representative

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