

Company: TCM Group LLC

FRN: 0029641420

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1. Provider Role & STIR/SHAKEN Status

TCM GROUP LLC is a **Voice Service Provider serving end-users.**

Our outbound traffic is delivered through trusted upstream carriers that perform **STIR/SHAKEN signing** on eligible IP-based calls.

Because STIR/SHAKEN is not implemented directly by our company on our own equipment, we qualify under:

Partial STIR/SHAKEN Implementation

2. Know-Your-Customer (KYC) Procedures

We verify all customers before enabling calling services. This includes:

- Verification of business identity
 - Collection of EIN, state registration, and responsible party information
 - Review of intended use cases for voice services
 - Additional scrutiny of high-risk industries
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3. Caller ID Validation & Numbering Controls

BIZITSS:

- Assigns only valid, authorized caller ID numbers
- Requires users to prove authorization for third-party numbers
- Blocks malformed or spoof-suspect calling numbers

4. Outbound Traffic Monitoring

We actively monitor outbound traffic for illegal robocalling patterns, including:

- High call-per-second rates
- Short-duration/rapid-fire call patterns
- Low answer-seize ratio anomalies
- Calls to known Do-Not-Originate (DNO) numbers

5. Response to Traceback Requests

We comply with traceback requests from:

- The Industry Traceback Group (ITG)
- FCC Enforcement Bureau
- Law enforcement agencies

We respond **within 24 hours**.

6. Enforcement, Remediation, and Termination

If we detect illegal or suspicious robocalling:

- We immediately investigate the source
- We may suspend outbound calling
- We may terminate the customer
- We may notify law enforcement

FCC mitigation rules require active enforcement against bad actors.

7. Cooperation With Investigations

We fully cooperate with all federal, state, and industry investigations, including efforts to stop illegal robocalling across networks.

8. Annual Review and Recertification

We review this Robocall Mitigation Plan annually and recertify our FCC RMD filing as required by the FCC's March 1 annual recertification rule update.