
TIMICO FARM SRL – Corporate Compliance Division

Robocall Mitigation Program (Public Redacted Version)

1. Executive Summary

TIMICO FARM SRL maintains a structured and policy-driven Robocall Mitigation Program aligned with FCC requirements under 47 CFR §64.6305.

This public-facing document provides a high-level overview of our compliance framework. Proprietary operational details, internal thresholds, and security-sensitive procedures have been intentionally removed in accordance with corporate policy.

2. Company Profile

Company: TIMICO FARM SRL

Business Address (Redacted): Bucharest, Romania

Compliance Contact (Public Redacted):

Compliance Officer – Corporate Compliance Division

Email: compliance@timicofarm.com

Phone: +40*****

TIMICO FARM SRL operates as an international wholesale voice provider originating SIP-based outbound voice services.

The company does not maintain direct IP interconnection with the U.S. PSTN; authentication and attestation are therefore performed by certified upstream carriers.

3. STIR/SHAKEN Compliance Status

Under **47 CFR §64.6301(a)**, TIMICO FARM SRL qualifies for the exemption from full STIR/SHAKEN implementation due to the absence of direct IP interconnection with the U.S. PSTN.

STIR/SHAKEN authentication for outbound calls is performed by upstream providers with valid certificate authority credentials.

TIMICO FARM SRL monitors attestation results and collaborates with partners to ensure consistency and authentication integrity.

4. Corporate Robocall Mitigation Framework

The company maintains a multi-layered mitigation structure including:

- Comprehensive client onboarding and Know-Your-Customer (KYC) validation
- Verification of lawful business purpose and intended call use-cases
- Continuous monitoring of call metadata for indicators of unlawful robocalling
- Detection of short-duration anomalies, sequential or patterned dialing, and irregular ANI usage
- Enforcement actions including temporary suspension or termination of service
- Documented internal review and escalation procedures

This framework aligns with FCC expectations for providers using partial STIR/SHAKEN implementation.

5. Network Integrity & Security Controls

To maintain integrity and prevent unauthorized or unlawful use of the network, TIMICO FARM SRL deploys:

- SIP authentication and controlled-access account mechanisms
- Rate-limiting and geographic risk filtering
- Fraud-prevention heuristics
- Continuous security and traffic monitoring

(Specific technical thresholds, filtering logic, and detection algorithms have been intentionally omitted from this public version.)

6. Industry Traceback Cooperation

TIMICO FARM SRL fully cooperates with the **USTelecom Industry Traceback Group (ITG)**. The company responds promptly to traceback requests and provides required call-routing metadata in accordance with FCC rules.

7. Governance & Oversight

The Robocall Mitigation Program is overseen by the **Corporate Compliance Division**, responsible for policy enforcement, monitoring regulatory developments, internal auditing, and reporting to executive management.

Program documentation and compliance procedures are reviewed periodically to ensure alignment with FCC regulatory expectations and industry best practices.

8. Certification Statement

TIMICO FARM SRL certifies that this public redacted version accurately reflects its Robocall Mitigation Program as required by 47 CFR §64.6305, while excluding proprietary or sensitive operational content that is not subject to public disclosure.

END OF DOCUMENT – PUBLIC VERSION