

Robocall Mitigation Program Description

Company Name: TrueNet Telecom LLC

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Voice Service Provider Role in the Call Chain: Voice Service Provider with a STIR/SHAKEN obligation acting as a wholesale provider originating calls and serving end-users

1. Overview & Regulatory Commitment

TrueNet Telecom LLC is a U.S.-based telecommunications provider operating in the call chain as a Voice Service Provider with a STIR/SHAKEN obligation, acting as a wholesale provider originating calls and serving end-users. The company offers wholesale VoIP services, SIP trunking, DID services, and enterprise voice solutions. The company is fully committed to compliance with regulations established by the Federal Communications Commission regarding robocall mitigation, unlawful traffic prevention, and caller ID authentication.

TrueNet Telecom LLC maintains a proactive and continuously evolving robocall mitigation framework designed to prevent, detect, and eliminate illegal robocall traffic across its network infrastructure.

2. STIR/SHAKEN Implementation (Primary Mitigation Framework)

Consistent with its role as a Voice Service Provider with a STIR/SHAKEN obligation, TrueNet Telecom LLC has fully implemented the STIR/SHAKEN protocol across all IP-based voice services:

- All outbound calls are cryptographically signed using valid SPC tokens issued by an authorized STI Certification Authority
- Calls are attested at the appropriate level (A, B, or C) based on the level of customer identity verification and call origination control
- Only authenticated traffic is allowed to originate from the network
- Calls that fail authentication checks or contain invalid identity headers are automatically flagged, restricted, or blocked

This implementation ensures compliance with FCC requirements and provides a strong first layer of robocall prevention.

3. Customer Onboarding & KYC (Know Your Customer) Program

TrueNet Telecom LLC enforces a strict multi-layered customer vetting process prior to granting network access:

3.1 Pre-Onboarding Verification

- Collection of legal business documentation (Articles of Incorporation, EIN verification, business licenses)
- Verification of company ownership and beneficial owners
- Identity validation of authorized representatives
- Validation of physical business address and operational presence
- Screening against known fraud databases and high-risk indicators

3.2 Use Case & Traffic Profiling

- Detailed evaluation of intended traffic type (call center, enterprise, wholesale, etc.)
- Assessment of call flows, target destinations, and expected volumes
- Review of dialing practices and compliance with applicable laws (TCPA, DNC regulations)

3.3 Risk-Based Approval

- Customers are assigned a risk level based on their profile
- High-risk customers are either rejected or subject to enhanced monitoring and limited access
- Only fully verified, low-risk customers are permitted to originate traffic

3.4 Contractual Compliance Controls

- Mandatory acceptance of Acceptable Use Policy (AUP)
- Explicit prohibition of illegal robocalls, spoofing, and fraudulent activity

- Clear enforcement clauses including immediate suspension or termination
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4. Real-Time Traffic Monitoring & Analytics

TrueNet Telecom LLC utilizes advanced monitoring systems to analyze network traffic continuously:

- Monitoring of ACD (Average Call Duration), ASR (Answer-Seizure Ratio), CPS (Calls Per Second), and PDD
- Detection of abnormal traffic spikes, short-duration calls, and call pumping patterns
- Identification of suspicious call behaviors such as sequential dialing or high-volume bursts
- Automated alerts triggered by predefined fraud thresholds

Traffic identified as anomalous or suspicious is immediately escalated for investigation.

5. Call Blocking, Filtering & Prevention Mechanisms

The company implements multiple layers of call filtering and fraud prevention:

- Blocking of invalid, unallocated, or spoofed caller ID numbers
 - Enforcement of caller ID validation and format compliance
 - Integration with industry reputation databases and analytics tools
 - Blocking of traffic associated with known scam patterns or high complaint rates
 - Optional implementation of DNC list enforcement based on customer use case
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6. Traceback Cooperation & Incident Response

TrueNet Telecom LLC actively participates in industry traceback efforts, including coordination with the U.S. Telecom Industry Traceback Group.

6.1 Traceback Response Process

- Immediate acknowledgment of traceback requests
- Identification of originating customer and call path
- Retrieval and analysis of relevant Call Detail Records (CDRs)
- Provision of requested data to authorized entities

6.2 Enforcement Actions

- Immediate suspension of suspected traffic sources during investigation
- Permanent termination of customers involved in confirmed illegal robocalling
- Blacklisting of repeat offenders and associated entities

6.3 Escalation & Reporting

- Notification to upstream/downstream carriers when necessary
 - Cooperation with law enforcement and regulatory authorities
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7. Network Security & Access Controls

TrueNet Telecom LLC maintains strict network-level protections:

- Controlled SIP signaling and RTP media routing
 - IP authentication and access control lists (ACLs)
 - Firewall protection and intrusion detection/prevention systems
 - Segregation of customer traffic and routing policies
 - Continuous monitoring of signaling anomalies
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8. Record Retention & Compliance Management

The company maintains comprehensive records to support compliance:

- Call Detail Records (CDRs) retained for regulatory and investigative purposes
- STIR/SHAKEN authentication logs and certificate records

- Customer onboarding and KYC documentation
 - Incident reports and mitigation action logs
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9. Continuous Improvement & Governance

TrueNet Telecom LLC continuously enhances its robocall mitigation program:

- Regular updates aligned with FCC guidance and industry best practices
 - Ongoing staff training on fraud detection and regulatory compliance
 - Deployment of enhanced analytics and AI-based fraud detection tools
 - Periodic audits of traffic patterns and customer activity
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10. Zero-Tolerance Policy & Commitment Statement

TrueNet Telecom LLC enforces a strict zero-tolerance policy toward illegal robocalls, spoofing, and fraudulent telecommunications activity.

The company is committed to maintaining a secure, transparent, and compliant telecommunications environment and takes immediate action against any misuse of its network.