

Robocall Mitigation Program Description

Company Name: Tecnicom, Registration Number (FRN): 0038183828, Date: March 19, 2026

1. **Introduction** This document outlines the Robocall Mitigation Program implemented by Tecnicom. As a voice service provider offering services to end-users, Tecnicom is committed to preventing our network from being used to originate illegal robocalls and to fully complying with the Federal Communications Commission (FCC) regulations outlined in 47 CFR § 64.6305.
2. **"Know Your Customer" (KYC) Practices** Tecnicom strictly enforces "Know Your Customer" policies to validate the identity of all end-users before granting access to our voice services. Our onboarding process includes:
 - **Identity Verification:** Collecting and verifying the legal name, physical address, and contact information of the end-user.
 - **Business Verification:** For enterprise or business customers, we verify their legal business registration and operational status.
 - **Terms of Service:** All end-users must agree to our Terms of Service (ToS) and Acceptable Use Policy (AUP), which explicitly prohibit the use of our services for illegal robocalling, caller ID spoofing, or any telemarketing that violates the Telephone Consumer Protection Act (TCPA).
3. **Network Monitoring and Traffic Analysis** To ensure end-users do not engage in illegal calling campaigns, Tecnicom actively monitors network traffic for suspicious patterns. Our monitoring practices include:
 - Analyzing call detail records (CDRs) for anomalies, such as an exceptionally high volume of outgoing calls or a high ratio of short-duration calls.
 - Investigating traffic spikes that are inconsistent with the end-user's normal behavior or stated business purpose.
4. **Mitigation and Enforcement Actions** If Tecnicom detects suspicious activity or receives reports that an end-user is originating illegal robocalls, we take immediate action. These steps include:
 - Conducting an internal investigation into the flagged traffic.
 - Issuing warnings or requiring the end-user to cease the non-compliant activity immediately.
 - Suspending or permanently terminating the account of any end-user found to be intentionally violating our anti-robocall policies, and blocking their traffic from our network.
5. **Traceback Cooperation Commitment** Tecnicom explicitly commits to fully cooperating with the FCC, law enforcement agencies, and the industry Traceback Consortium (the Industry Traceback Group or ITG). We commit to responding fully and within 24 hours to all traceback requests to investigate and identify the source of illegal robocalls originating on our network.