

FCC Robocall Mitigation Plan

TECHNOLOGY ANALYSIS SYSTEM, INC

1. Executive Summary and Regulatory Commitment

TECHNOLOGY ANALYSIS SYSTEM, INC (“TECHNOLOGY ANALYSIS SYSTEM”) is an interconnected VoIP provider specializing in international gateway traffic aggregation for wholesale, enterprise, and call center clients. TECHNOLOGY ANALYSIS SYSTEM is fully committed to complying with the Federal Communications Commission’s (FCC) robocall mitigation rules codified at 47 C.F.R. § 64.6300 et seq. This Robocall Mitigation Plan (RMP) establishes a comprehensive, multi-layered framework designed to prevent the origination, transit, and termination of unlawful robocall traffic across TECHNOLOGY ANALYSIS SYSTEM’s network. TECHNOLOGY ANALYSIS SYSTEM’s approach combines mandatory STIR/SHAKEN implementation, rigorous customer vetting, continuous network surveillance, proactive blocking mechanisms, and full cooperation with industry traceback efforts.

2. STIR/SHAKEN Implementation and Interim Measures

TECHNOLOGY ANALYSIS SYSTEM qualifies as a small provider under FCC guidelines and is executing a defined path toward full STIR/SHAKEN deployment across its IP-based infrastructure. While pursuing this objective, TECHNOLOGY ANALYSIS SYSTEM has implemented and strictly enforces alternative effective measures that meet or exceed FCC expectations for illegal robocall mitigation. These measures include:

- Mandatory attestation verification for all IP-originated traffic where STIR/SHAKEN is available.
- Active rejection of unauthenticated traffic from non-compliant or unregistered providers.
- Documentation of all interim measures to ensure audit readiness and regulatory transparency.

TECHNOLOGY ANALYSIS SYSTEM will complete full STIR/SHAKEN implementation in accordance with all applicable deadlines and will promptly update this plan and its FCC Robocall Mitigation Database (RMD) filing upon deployment.

3. Comprehensive Mitigation Framework

3.1. Strict Contractual Controls and Enforcement Authority

All customer agreements incorporate explicit prohibitions against:

- Illegal robocalling, including autodialed, prerecorded, or artificial voice calls made without proper consent.
- Caller ID spoofing in violation of the Truth in Caller ID Act.
- Violations of the Telephone Consumer Protection Act (TCPA), FTC Telemarketing Sales Rule, and applicable state telemarketing laws.

TECHNOLOGY ANALYSIS SYSTEM contractually reserves and exercises the right to:

- Immediately suspend or block traffic upon reasonable suspicion of illegal activity.
- Terminate service permanently for confirmed violations without advance notice.
- Impose financial penalties or recover costs associated with traceback investigations or regulatory actions arising from customer misconduct.

3.2. Enhanced Know Your Customer (KYC) and Risk-Based Onboarding

TECHNOLOGY ANALYSIS SYSTEM employs a risk-based, multi-tiered customer vetting process that exceeds standard due diligence. For all prospective clients, TECHNOLOGY ANALYSIS SYSTEM requires:

- **Entity Verification:** Validation of legal business registration, physical address, and active operational status.
- **Ownership and Control Disclosure:** Identification of principals, officers, and key decision-makers.
- **Traffic Profiling:** Detailed documentation of expected traffic types, call volumes, origination points, destination geographies, and use cases (e.g., call center, enterprise communications, wholesale aggregation).
- **Compliance Attestation:** Signed certification that the customer understands and will comply with all applicable robocall and spoofing laws.
- **Financial Verification:** Valid USAC Filer ID, verifiable banking information, and credit references where applicable.

High-risk applicants—including those with opaque ownership structures, offshore operations without clear jurisdictional accountability, or traffic profiles consistent with

known robocall vectors—are subject to enhanced scrutiny, including site visits, executive interviews, and conditional service approval with additional monitoring.

3.3. Real-Time Network Monitoring and Automated Threat Response

TECHNOLOGY ANALYSIS SYSTEM maintains 24/7 network monitoring capabilities utilizing both automated analytics and manual oversight. Monitoring systems are configured to detect indicators of illegal robocalling, including but not limited to:

- Short-duration call spikes and high call completion rates.
- Suspicious calling patterns such as neighbor spoofing, sequential dialing, or calls to unassigned numbers.
- Anomalous traffic originating from or terminating to high-risk jurisdictions.
- Unusual revenue or settlement patterns indicative of traffic pumping or toll fraud.

Upon detection of suspicious activity, TECHNOLOGY ANALYSIS SYSTEM's incident response protocols include:

- Automated alerting to engineering and compliance personnel.
- Immediate temporary traffic throttling or blocking pending investigation.
- Forensic analysis of call detail records (CDRs) and signaling data.
- Escalation to formal investigation, which may result in permanent service termination and referral to law enforcement or the Industry Traceback Group (ITG).

3.4. Robocall Mitigation Database (RMD) Compliance and Supply Chain Integrity

TECHNOLOGY ANALYSIS SYSTEM is actively registered in the FCC's Robocall Mitigation Database and maintains its registration in good standing. TECHNOLOGY ANALYSIS SYSTEM enforces a strict policy of only accepting voice traffic for termination from:

- Providers that are themselves registered in the RMD.
- Providers that have filed a current and compliant RMP with the FCC.

TECHNOLOGY ANALYSIS SYSTEM conducts periodic reviews of its upstream and downstream partners to ensure continued compliance and reserves the right to cease interconnections with any entity that fails to maintain RMD registration or violates applicable robocall mitigation standards.

3.5. Full Participation in Traceback Investigations

TECHNOLOGY ANALYSIS SYSTEM is committed to the prompt and complete cooperation with all lawful traceback requests. This includes:

- Designating a primary point of contact for traceback coordination available 24/7.
- Responding to traceback requests from the Industry Traceback Group, FCC, and law enforcement within established timelines (typically 24 hours or less).
- Preserving call records and evidence relevant to active investigations.
- Taking corrective action against customers identified as sources of illegal robocalls, including permanent disconnection and notification to relevant authorities.

TECHNOLOGY ANALYSIS SYSTEM views traceback participation not merely as a regulatory obligation but as a critical mechanism for protecting the integrity of the broader communications ecosystem.

4. Governance, Accountability, and Continuous Improvement

TECHNOLOGY ANALYSIS SYSTEM maintains a formal governance structure to oversee robocall mitigation efforts, including:

- **Designated Compliance Officer:** Responsible for policy implementation, monitoring oversight, and regulatory reporting.
- **Annual RMP Review:** This plan is reviewed at least annually and updated as necessary to reflect changes in technology, regulatory requirements, and industry best practices.
- **Employee Training:** Technical and compliance personnel receive ongoing training on robocall mitigation, traceback procedures, and emerging threat vectors.
- **Incident Documentation:** All investigations, enforcement actions, and traffic blocks are documented to support audit readiness and continuous improvement.

TECHNOLOGY ANALYSIS SYSTEM actively monitors guidance issued by the FCC, the Industry Traceback Group, and other relevant authorities to ensure its practices remain aligned with evolving standards.

5. Plan Administration and Certification

TECHNOLOGY ANALYSIS SYSTEM certifies that the information contained in this Robocall Mitigation Plan is true, accurate, and complete to the best of its knowledge. This plan is filed in accordance with FCC requirements and will be updated and refiled in the Robocall Mitigation Database within ten (10) business days of any material change to the practices, policies, or procedures described herein. TECHNOLOGY ANALYSIS SYSTEM further certifies that it has implemented, and will continue to maintain, effective measures to prevent illegal robocalls as required under 47 C.F.R. § 64.6300 et seq.
