
ROBOCALL MITIGATION PLAN RMD

Company: TITAN GLOBAL SOLUTION LLC

Effective Date: April 17, 2026

I. Introduction and Statement of Principles

TITAN GLOBAL SOLUTION LLC maintains an unwavering commitment to consumer protection and the integrity of the global telecommunications network. We have established a comprehensive and rigorous Robocall Mitigation Program designed in accordance with industry-leading security standards. This program proactively prevents, detects, and blocks illicit calling traffic, caller ID spoofing, and all forms of unauthorized automated telemarketing.

II. Network Architecture and Origination Control

Our technological infrastructure prioritizes security, verifiable authentication, and traceability at every operational tier:

- **Management Platform:** We deploy a hardened PBX infrastructure as our core routing and call management system, ensuring a strictly controlled, auditable, and secure operational environment.
- **Signaling Security:** All voice traffic and SIP signaling are safeguarded utilizing industry-standard encryption protocols (TLS/SRTP) to unequivocally prevent data manipulation, interception, or unauthorized access.
- **Origination Restriction:** Network traffic is explicitly constrained to originate solely from authenticated, verified, and previously authorized endpoints and extensions.
- **Traffic Filtering:** We categorically reject and drop traffic originating from unknown sources, unverified third-party networks, or entities failing to meet our stringent authentication criteria.

III. "Know Your Customer" (KYC) Compliance Framework

To systematically mitigate risk and preclude access by bad actors, we enforce a rigorous KYC compliance framework for all prospective and existing clients:

- **Identity Verification:** We mandate the submission of certified business documentation, stringent identity verification of legal representatives, and cross-referenced physical and tax contact information prior to service provisioning.
- **Use Case Evaluation:** We conduct a comprehensive vetting of each client's business model and intended telecommunications use case to guarantee strict alignment with our

acceptable use policies.

- **Mass Traffic Restrictions:** Our Terms of Service unequivocally prohibit the utilization of our network for unauthenticated broadcast traffic, illegal robocalling, unregulated predictive dialers, or any automated telemarketing activities lacking prior express written consent, thereby ensuring strict compliance with the Telephone Consumer Protection Act (TCPA).

IV. Continuous Traffic Monitoring and Analysis

TITAN GLOBAL SOLUTION LLC deploys active, continuous monitoring of network traffic patterns to swiftly identify anomalies indicative of illicit activity:

- **Real-Time Alert Metrics:** We execute real-time traffic heuristics to detect abnormal volume spikes and excessive Calls Per Second (CPS) rates.
- **Performance Analysis:** Our analytical systems are calibrated to flag and audit accounts exhibiting patterns characteristic of robocalling campaigns, including short-duration traffic, depressed Answer Seizure Ratios (ASR), and abnormally low Average Length of Call (ALOC) metrics.
- **Periodic Audits:** We perform systematic, periodic audits of Call Detail Records (CDRs) to validate ongoing adherence to internal compliance mandates and federal regulatory standards.

V. Response, Mitigation, and Traceback Protocols

Upon the detection of suspicious network activity or the receipt of notifications from upstream carriers or regulatory authorities regarding illicit traffic:

- **Immediate Action:** We will execute immediate administrative action—including the suspension, blocking, or total termination—of any account or extension identified as a source of illegal traffic.
- **Traceback Cooperation:** We pledge full and transparent cooperation with the FCC's Industry Traceback Group (ITG), the Traceback Consortium, and relevant law enforcement agencies, committing to identify and report the source of any suspicious network traffic within a strict 24-hour timeframe.

VI. STIR/SHAKEN Implementation Status

In strict adherence to the current mandates of the Federal Communications Commission (FCC):

- **Extension Certification:** TITAN GLOBAL SOLUTION LLC formally certifies that it currently qualifies for the implementation extension of the STIR/SHAKEN caller ID authentication framework applicable to small voice service providers, in accordance with the provisions set forth in 47 C.F.R. § 64.6304.

