

Robocall Mitigation Program Description

Filing Entity: TurnCom 360 LLC

FCC Registration Number (FRN): 0038385472

Business Address: 100 South Garnett Street, Henderson, NC 27536

Robocall Mitigation Contact: William Turner, Owner / Compliance Contact

Contact Email: billt@turncom360.com

Contact Telephone: 919-101-2099

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1. Company Role and Network Arrangement

TurnCom 360 LLC provides voice communications services to end-user customers as a service provider/reseller using the SkySwitch platform and related upstream network providers. TurnCom 360 LLC does not represent that it independently operates every network element used for call authentication or call completion. TurnCom 360 LLC relies on SkySwitch and/or other upstream providers for network-level call processing and STIR/SHAKEN functionality where applicable, while TurnCom 360 LLC remains responsible for customer vetting, acceptable-use enforcement, customer-originated traffic oversight, traceback response, and other reasonable steps within its operational control to prevent illegal robocall traffic.

2. STIR/SHAKEN Implementation Status

TurnCom 360 LLC is filing based on a partial STIR/SHAKEN implementation posture. Calls originated by TurnCom 360 LLC customers may be authenticated, signed, routed, or otherwise processed through the SkySwitch platform and/or upstream providers that perform STIR/SHAKEN functions on supported IP portions of the network. TurnCom 360 LLC will coordinate with SkySwitch and upstream providers to support caller ID authentication requirements and to resolve any issues identified with traffic originated by TurnCom 360 LLC customers.

3. Customer Vetting and Onboarding

TurnCom 360 LLC takes reasonable steps to know its customers and reduce the risk that voice services are used for illegal robocalling or spoofing. These steps include, as appropriate:

- Collecting customer identity and business contact information before activating service.
- Reviewing the nature of the customer relationship, intended service use, requested telephone numbers, and expected calling patterns.
- Requiring customers to use services lawfully and prohibiting illegal robocalling, spoofing, fraud, scam calling, and abusive traffic.
- Declining, delaying, suspending, or terminating service where a customer cannot be reasonably verified or presents an unacceptable risk.

4. Traffic Monitoring and Detection of Suspicious Activity

TurnCom 360 LLC reviews and responds to indications of suspicious, unlawful, or abusive calling activity involving its customers. TurnCom 360 LLC may use reports from SkySwitch, upstream providers, analytics vendors, traceback notices, customer complaints, calling-pattern anomalies, high-volume or short-duration traffic, invalid or misleading caller ID information, or other available signals to identify potentially unlawful traffic. When suspicious activity is identified, TurnCom 360 LLC may investigate the customer account, require additional information, restrict calling capabilities, suspend service, terminate service, or take other appropriate remedial action.

5. Caller ID and Spoofing Controls

TurnCom 360 LLC prohibits customers from transmitting inaccurate, misleading, or spoofed caller ID information for unlawful purposes. TurnCom 360 LLC expects customers to use telephone numbers that they are authorized to use and to comply with applicable laws and regulations governing caller ID, consent, telemarketing, and robocalls. Where unauthorized or suspicious caller ID use is identified, TurnCom 360 LLC will investigate and may require correction, remove or restrict the customer's ability to use the number, suspend service, or terminate the customer relationship.

6. Traceback and Law-Enforcement Cooperation

TurnCom 360 LLC commits to respond fully and within 24 hours to traceback requests from the FCC, law enforcement, the Industry Traceback Group, SkySwitch, upstream providers, or other authorized traceback entities. TurnCom 360 LLC will use available account records, call detail records, customer information, and provider/platform information to identify the source of traffic and will cooperate in investigations intended to stop illegal robocalls. TurnCom 360 LLC will preserve and provide relevant information as appropriate and consistent with applicable law.

7. Response to Confirmed or Suspected Illegal Traffic

If TurnCom 360 LLC determines that a customer has originated or facilitated illegal robocalls, spoofing, scam traffic, or other prohibited traffic, TurnCom 360 LLC may take one or more of the following actions:

- Issue a notice requiring immediate correction or explanation.
- Restrict outbound calling, international calling, high-volume calling, or other service features.
- Suspend or terminate the customer's voice service.
- Block or remove telephone numbers associated with the unlawful activity.
- Coordinate with SkySwitch, upstream providers, traceback entities, regulators, or law enforcement as appropriate.

8. Customer Terms and Acceptable Use

TurnCom 360 LLC requires customers to use voice services in compliance with applicable federal and state laws, FCC rules, telemarketing and robocall requirements, consent rules, caller ID requirements, and any applicable acceptable-use terms. Customers may not use TurnCom 360 LLC services to transmit illegal robocalls, unlawful prerecorded or artificial voice calls, scam calls, fraudulent traffic, spoofed caller ID traffic, or other abusive communications.

9. Ongoing Review and Updates

TurnCom 360 LLC will periodically review this robocall mitigation program and update it as needed based on operational experience, provider requirements, FCC rules, traceback trends, customer risk, and changes in the services offered. TurnCom 360 LLC will update its Robocall Mitigation Database submission within the time required by FCC rules if there are material changes to its certification, contact information, provider role, or robocall mitigation program.

10. Certification Statement

TurnCom 360 LLC certifies that all calls it originates or enables through its voice service offering are subject to this robocall mitigation program. TurnCom 360 LLC further certifies that it will take reasonable steps to avoid originating illegal robocall traffic, will respond fully and within 24 hours to traceback requests, and will cooperate with the FCC, law enforcement, the Industry Traceback Group, SkySwitch, upstream providers, and other appropriate entities in investigating and stopping illegal robocallers that use or attempt to use TurnCom 360 LLC services.

Submitted by:

William Turner, Owner

William Turner

TurnCom 360 LLC