
ROBOCALL MITIGATION PLAN

Telegenta LLC
FRN: 0038274791
Originating Voice Service Provider
Network Type: IP

1. Company Information

Legal Name: Telegenta LLC
FCC Registration Number: 0038274791
OCN/CC: 925L
Provider Role: Originating Voice Service Provider
Network Type: IP

Primary Compliance Contact

- **Name:** Allan Kristensen
- **Email:** ak@telegenta.com
- **Address:** 254 Chapman Rd - Ste 208 #24714, Newark, Delaware 19702
- **Phone:** (302) 451-9255
- **24/7 Contact:** (302) 451-9255

Telegenta LLC designates this contact for all traceback, enforcement, and robocall-related compliance matters.

2. STIR/SHAKEN Implementation Status

Telegenta LLC is now fully STIR/SHAKEN compliant with STI-PA/iconectiv.

Because Telegenta operates an IP-based network and the company maintains a **full robocall mitigation program** for all originating traffic, in accordance with **47 CFR §64.6305** and subsequent FCC orders.

3. Robocall Mitigation Program

3.1 Customer Vetting (Know Your Customer – KYC)

Telegenta LLC employs strict onboarding procedures to prevent illegal robocall origination:

- Verification of business identity, corporate registration, and physical address
 - Collection of responsible party contact information
 - Review of intended calling use cases and traffic profiles
 - Screening for high-risk industries (e.g., lead generation, outbound call centers, debt recovery)
 - Refusal of service to customers who cannot demonstrate legitimate calling needs
 - For wholesale customers, we create a contract with a business entity. We require our customers to verify the identity of clients, using business certificates and/or personal id.
 - We store contact person, business address, and payment card for every client. This is required to procure numbers, which again is required to perform termination of calls
 - The product is always used as part of SaaS product inside the client web browser, so it's not possible to perform robocalls (we don't offer SIP termination)
 - Our customers are required to purchase a phone number with us if they want to terminate calls. In some cases, we allow third party numbers, and these are always checked by calling the number to confirm the number belongs to the client.
 - All calls must be made from whitelisted numbers or calls will be rejected.
 - Additionally, we do not allow call diversion in our system, this must be manually enabled per account.
 - We use the same process for all customers regardless of world location. No customers are allowed to purchase numbers without knowing the identity of the customer.
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3.2 Ongoing Traffic Monitoring

Telegenta LLC continuously monitors outbound traffic for indicators of illegal robocalling:

- Real-time analytics to detect short-duration, high-volume, or sequential dialing
 - Alerts for anomalous spikes or deviations from expected patterns
 - Monitoring of call behavior inconsistent with customer profiles
 - Daily and weekly traffic reports reviewed by compliance personnel
 - We have several metrics and thresholds to make sure customers stay within our terms.
 - ASR must be above 60%
 - ACD must be above 45 seconds
 - Daily short calls (less than 5 seconds for no connect) < 20 calls per day allowed
 - Some metrics will get clients flagged and others will automatically disable calling for the client.
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3.3 Call Blocking & Enforcement

When suspicious or illegal traffic is detected:

- Immediate investigation by compliance staff
 - Temporary blocking or rate-limiting of traffic
 - Suspension or termination of offending customers
 - Documentation of all enforcement actions
 - Notification to upstream/downstream carriers when appropriate
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4. Traceback Cooperation

Telegenta LLC fully cooperates with the **Industry Traceback Group (ITG)**, the FCC, and law enforcement. We store information about every call in our database (CDR). This information includes Customer, Sip account, IP address, A & B- number and route. Additionally, we capture and store SIP traces for every call in- and outbound.

Commitment:

Telegenta LLC responds to all traceback requests within **24 hours**, providing complete call path information and customer identification as required.

5. Network-Level Protections

As an **IP-based Originating Provider**, Telegenta LLC implements:

- Caller ID validation and screening
 - Blocking of calls with invalid, malformed, or unassigned numbers
 - SIP header integrity checks
 - Rate limiting and anomaly detection
 - Monitoring for known illegal robocall signatures
 - Enhanced scrutiny of high-risk traffic due to lack of STIR/SHAKEN authentication
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6. Policies, Terms, and Enforcement

Telegenta LLC maintains written policies that:

- Prohibit customers from originating illegal robocalls
- Require compliance with the TCPA, TSR, and FCC rules
- Require customers to maintain consent records and opt-out mechanisms

- Allow immediate suspension or termination for violations
- Our terms state that all customers must adhere to local law and policies. We can close their account at any time at our discretion.

Employees receive training on:

- Identifying suspicious traffic
 - Responding to traceback requests
 - Enforcement procedures
 - Documentation requirements
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7. Recordkeeping

Telegenta LLC maintains:

- Customer onboarding documentation
- Traffic analytics logs
- Enforcement actions
- Traceback responses

Records are retained for **a minimum of two years**, or longer if required by law.

8. Summary Statement for FCC RMD Filing

“Telegenta LLC implements a comprehensive robocall mitigation program that includes customer identity verification, traffic monitoring, call analytics, and blocking of suspicious or illegal call patterns. Telegenta LLC maintains strict enforcement policies, cooperates fully with traceback requests within 24 hours, and continuously monitors its IP network to prevent the origination of illegal robocalls. Telegenta LLC has implemented STIR/SHAKEN and therefore applies full mitigation measures to all originating traffic.”
