

Robocall Mitigation Plan

TCP Software (TimeClock Plus, LLC)

Overview

TCP Software is a workforce management software provider. We do not operate telecommunications network infrastructure. Outbound voice calls are originated exclusively through Bandwidth Inc.'s Voice API. As a software application provider without control over the underlying network infrastructure, we are exempt from STIR/SHAKEN implementation pursuant to 47 CFR §64.6305(d)(2)(i).

Nature and Scope of Outbound Calling

Our outbound voice calling is limited to a single, narrowly scoped use case: automated substitute assignment notifications delivered through our TimeClock Plus workforce management platform. When a scheduled shift cannot be filled, the system places outbound calls to a pre-defined pool of substitute employees to notify them of available assignments and collect a keypad response (accept or decline). Calls are placed only during pre-configured time windows (e.g., scheduled morning or evening windows) and cease automatically once all assignments are filled or the call window closes.

Known and Consented Recipients

All call recipients are individuals who are registered members of an employer's substitute pool within TimeClock Plus. These individuals have a pre-existing employment relationship with the organization and are aware that they may receive automated calls regarding substitute assignments. No calls are placed to third parties, purchased lists, or unknown recipients.

Call Volume Controls

Call volume is constrained by the size of the employer's substitute pool and the number of unfilled assignments at any given time. Calls are not made in bulk to arbitrary recipients. They are targeted, event-driven, and bounded by system logic.

Traceback Response

TCP Software is committed to responding to traceback requests from the USTelecom Industry Traceback Group (ITG) or any other authorized traceback entity within 24 hours of receipt. All traceback inquiries should be directed to our designated compliance contact:

RobocallMitigation@tcpsoftware.com

In response to a traceback request, TCP Software will coordinate with our carrier partner, Bandwidth Inc., to confirm whether the identified call was originated through their network. Bandwidth retains call records for approximately 1,150 days. If the call is confirmed, we will cross-reference the recipient phone number against our customer

databases to identify the school district account that initiated the call run. We are committed to providing all available information in response to any traceback request and will respond fully and in good faith.

Traffic Monitoring

We monitor outbound call activity within TimeClock Plus for anomalous behavior. Any unexpected spike in call volume or patterns inconsistent with substitute assignment workflows would be flagged for immediate investigation.

Third-Party Carrier Compliance

All calls are originated through Bandwidth Inc., a registered voice service provider with an active Robocall Mitigation Database filing. We rely on Bandwidth to implement STIR/SHAKEN caller ID authentication on all calls transiting their network.