# TELCOM, LLC

# ROBOCALL MITIGATION PLAN

| | |
|---|---|
| **FCC Registration Number (FRN)** | 0037271699 |
| **Effective Date** | 15 July 2025 |
| **Provider Type** | Voice Service Provider |

## 1. Company and Service Description

Telcom, LLC ("Telcom") provides hosted voice and interconnected Voice over Internet Protocol (VoIP) services to business end users.

Telcom operates as a reseller of hosted voice services and uses Altaworx LLC as its underlying wholesale voice provider. Telcom does not operate or control the underlying network infrastructure necessary to perform STIR/SHAKEN caller ID authentication.

## 2. STIR/SHAKEN Status

Telcom does not independently implement STIR/SHAKEN authentication because it does not control the network infrastructure necessary to authenticate calls.

Telcom relies on Altaworx LLC, its underlying wholesale provider, which controls the applicable network infrastructure, to perform STIR/SHAKEN authentication for outbound calls. Telcom therefore relies upon the exemption applicable to providers that do not control the network infrastructure necessary to authenticate calls.

## 3. Know-Your-Customer Procedures

Telcom takes reasonable steps to know and verify its end-user customers before providing voice services. Telcom primarily provides services to identifiable business customers. Customer information obtained or verified as appropriate may include:

- Legal business name
- Business or physical address
- Primary business contact
- Telephone number and email address
- Billing information
- Business identification information, when appropriate
- Information regarding the customer's intended use of Telcom voice services

Customers are expected to provide accurate information and use telephone numbers and caller identification information they are authorised to use. Telcom does not knowingly permit customers to use its services for illegal robocalling, fraudulent spoofing, or other unlawful calling activity.

## 4. Know-Your-Upstream-Provider Procedures

Telcom maintains a direct business relationship with Altaworx LLC as its underlying wholesale voice provider. Telcom knows the identity of its upstream provider and maintains appropriate business and operational contact information necessary to communicate concerning voice traffic, network issues, traceback requests, and suspected abusive traffic.

Telcom will cooperate with Altaworx LLC when investigation or mitigation of suspicious or illegal traffic requires information or action at the underlying network level.

## 5. Traffic Monitoring and Abuse Prevention

Telcom reviews available customer and calling information for indications of suspicious or potentially illegal calling activity. Potential indicators may include:

- Unusual outbound calling volumes

- Repeated short-duration calls
- Excessive failed or rejected calls
- Calling activity inconsistent with a customer's normal or stated business use
- Customer or consumer complaints
- Notifications from Altaworx LLC or another provider
- Traceback, regulatory, or law-enforcement inquiries

The presence of an unusual calling pattern does not by itself establish illegal activity. Telcom may review relevant information to determine whether investigation or corrective action is warranted. Where appropriate, Telcom may contact the customer, request additional information, restrict calling capabilities, suspend service, or terminate an account associated with confirmed illegal or fraudulent activity.

## 6. Data Analytics

Telcom does not represent that it independently operates a specialised third-party robocall analytics platform. To the extent traffic information, monitoring information, or network-level information is provided through its underlying service arrangement, Telcom may rely upon information available from Altaworx LLC to assist in investigating suspicious calling activity.

## 7. Traceback and Regulatory Cooperation

Telcom commits to responding fully and within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use Telcom's services to originate calls.

Upon receipt of a valid traceback request, Telcom will make reasonable efforts to:

1. Review available customer and call information.
2. Identify the customer associated with the traffic.
3. Determine the relevant source or provider information available to Telcom.
4. Coordinate with Altaworx LLC when network-level information or assistance is required.
5. Provide the required traceback response.
6. Take appropriate action to prevent confirmed illegal traffic from continuing to originate through Telcom's services.

## 8. Enforcement and Corrective Action

Telcom does not knowingly permit its services to be used to originate illegal robocalls or fraudulent calls. If Telcom identifies or receives credible information indicating that a customer is using its services for prohibited activity, Telcom may investigate the activity and take appropriate corrective action.

Corrective action may include restriction, suspension, or termination of service and cooperation with Altaworx LLC, the Federal Communications Commission, the industry traceback consortium, law enforcement, or other appropriate authorities.

## 9. Ongoing Compliance

Telcom will periodically review its robocall mitigation practices and update them when necessary to reflect changes in its operations, upstream-provider relationships, applicable regulatory requirements, or identified calling abuse.

## 10. Certification

I certify that I have reviewed this Robocall Mitigation Plan and that, to the best of my knowledge, the information contained herein accurately describes the reasonable measures implemented by Telcom, LLC to prevent its services from being used to originate illegal robocall traffic.

| | |
|---|---|
| **Company** | Telcom, LLC |
| **FRN** | 0037271699 |
| **Name** | Shane Emrick |

| | |
|---|---|
| **Title** | Owner / Managing Member |
| **Date** | 10/26/2026 |
| **Email** | shane@mytelcomservice.com |

**Telephone:** 601-218-3487