

TELECOM TECH

TELECOMTECHOUTLOOK.COM

SEPTEMBER 01, 2020

OUTLOOK



**IP TELEPHONY
OR VOIP
EDITION**



Jonathan S. Marshlian,
Founder/CEO

**THE
COMPLIANCE
GROUP
UNVEILS THE
'COMPLIANCE
SQUARE'**

\$15



THE COMPLIANCE GROUP UNVEILS THE 'COMPLIANCE SQUARE'

“Where all the Compliance Needs of the Telecom Industry Come Together”

“E ntering the communications services industry is not for the faint of heart,” says Jonathan S. Marashlian, founder and CEO of TCG. Advancements in communications technologies and platforms, the proliferation of Internet based telephony and software enabled communications solutions, and low barriers to market entry, the flood of businesses entering the communications services industry are often given a false sense of simplicity and ease. This leads many new entrants to underestimate not just the breadth and complexity of their regulatory and tax compliance obligations, but also the potentially costly consequences of non compliance. And what can really come back to haunt those who ignore their compliance responsibilities is the reality that exposure to liabilities is often “cumulative.” If your company was required to bill, collect and remit taxes and regulatory fees in the first month services were provided, but doesn’t start doing so until Year 2... Year 3... or beyond, the liabilities build up (and often never go away). You see, the problem with unpaid taxes is that taxes liabilities are like zombies... they never die!”

Many businesses believe they can start selling Voice over Internet Telephony (VoIP)(anything from SIP trunks and DID

to UCaaS and beyond), wireless, and other data transmission services and somehow comply with the myriad of distinct regulatory and tax obligations associated with each “flavor” of service without investing the time, effort, and financial resources necessary to ensure compliance. At the same time, well intentioned businesses are hesitant to dive headfirst into compliance out of fear they may price themselves out of the market by increasing their customers’ costs by 25 percent or more. This dynamic often results in new entrants “thinking” they are in compliance simply by paying the taxes and fees billed by their upstream suppliers. Unfortunately, they are not.

What these businesses fail to understand is that compliance in the communications services industry entails more than just paying communications taxes and fees to their underlying wholesale suppliers or simply obtaining a Filer ID from the Universal Service Administrative Company (USAC)—the agency responsible for administering the Federal Communications Commission’s (“FCC”) Universal Service Fund (“USF”) program and calling it a day. The realities of “telecom compliance” are markedly more complex. And the truth is that no two companies’ pathways to ensuring compliance are the same.

Jonathan S. Marashlian,
Founder/CEO



Compliance is a complicated, multifaceted, an often-customizable endeavor, where “one size” definitely does not “fit all.” New entrants, and even established providers, should think twice before handing over the keys to their compliance to an outsourced compliance vendor that promises the “Easy Button” or who suggest your company can “set it and forget it,” letting an automated software program take over the reins. Sustainable compliance in the real world involves a combination of experience, knowledge, risk sensitivity, thoughtful management, and the right software implemented the right way... right out of the gates.

Enter TCG and its one stop compliance shop, now available through its Compliance Square solution. Compliance Square, it’s Where Compliance Comes TogetherSM.

THE COMPLIANCE GROUP

HOME OF THE **AccuCompliance** Suite OF COMPLIANCE SOLUTIONS

AccuLicense ■ **AccuReg** ■ **AccuTax** ■ **AccuCorp** ■ **AccuAgent**

In a marketplace saturated with solutions vendors touting the “Easy Button,” only one outsourced compliance provider is willing to speak the hard truth, while at the same time delivering compliance solutions that really work, and work really well TCG.

The idea behind TCG was hatched out of the litany of missteps and shortcomings of its competitors. An awardwinning, nationally recognized Telecom Law Firm located on the footsteps of Washington, D.C., set off to create a better mousetrap nearly 15 years ago. The fundamental premise of TCG is simple, yet practically unheard of (as you’ll soon come to understand).

It should come as no surprise that lawyers make a lot of money helping their clients once their clients have gotten themselves in trouble. Lawyers are perceived as “necessary evils,” and expensive ones at that! There is truth to the saying, “everyone hates lawyers, until they need one.” Many in the legal profession feed off the carelessness of the business communities they represent, and telecom lawyers are no different. After all, why would any professional that makes a living off others’ mistakes do anything to help their future clients avoid trouble in the first instance?

Yet that is exactly why Marashlian & Donahue, PLLC, The CommLaw Group, created TCG. In addition to being the founder and CEO of TCG, Marashlian is also the managing partner at The CommLaw Group. He explains his seemingly counterintuitive reasoning thusly:

“The value of earning a client’s trust and, with it, both intrinsic and financial rewards, cannot be measured in days, months or even years. When a lawyer helps a client out of a sticky mess, sure, the lawyer is often mightily rewarded for a successful effort (indeed, even not so successful ones). But the cost of cleaning up a mess can leave a bad taste in the client’s mouth, which then makes the business less inclined to lean on their lawyer in the future. And what many lawyers fail to appreciate is that the economics of a longterm attorney client relationship, one that spans many years, even a lifetime, and which covers areas of the law beyond “regulatory” compliance, far outweigh the shortterm economics that coincides with putting out fires and mopping up messes...

“...what we encountered time and time again in our law firm’s practice is that we were cleaning up a lot of messy regulatory and tax compliance issues of businesses who’d been attracted to the alphabet soup of consultants and accounting firms promising low cost, handsfree compliance. Instead of simply focusing on the ‘shorttermism’ of maximizing firm profits that comes with dousing the flames of a fire (and then throwing our clients back into the tinder box of the outsourced compliance cottage industry), we decided to build a better mousetrap. And that is how TCG was born!”

“By injecting the knowledge, experience, and sensitivity of highly trained telecom attorneys into the DNA of a more affordable, predictably priced consultancy firm, and then developing software and business processes to create efficiencies and to drive the price of outsourcing compliance even lower, TCG delivers the best of all worlds. And the trust we earn in doing so is rewarded by lifelong attorney client relationships that tap into the full range of legal disciplines available at our firm, which spans everything from contract law, privacy and data protection, mergers & acquisitions, and nearly every practice area in between.”

The revolutionary thinking and unique business model espoused by TCG and its founder have not gone unnoticed. The CommLaw Group has been named the Leading Customer

Service Law Firm by ACG Global Awards multiple times and, over the years earned several Client Choice Awards as the top telecom law firm by International Law Office/Lexology. More recently, TCG was named one of 2020’s 10 Most Promising Telecom Consulting Service Providers by CIO Review.

Through significant investments in the development of software as a Service (SaaS) solutions and professional, skills-based onboarding and client relationship management services, TCG continues to make strides fulfilling its promise. As defined in its Mission Statement, “TCG provides best of breed, efficient, affordable and reliable outsourced compliance services and



We are the only compliance vendor in the marketplace built on the foundation of expert telecom attorney knowledge gained through nearly 15 years of USAC audit representation and experience. Our SaaS-based compliance platform has been designed from the ground up to ensure regulatory compliance with the complex web of service classification, revenue allocation, and reporting rules governing VoIP, Wireless and traditional telecom service providers

solutions to the communications and information technology industries; focused on fulfilling the management of the diverse and complex regulatory, tax, corporate and consultative needs unique to our core industry sectors.”

TCG’s newest breakthrough solutions were recently unveiled and are now available online at www.TheComplianceSquare.com. Compliance Square is “Where Compliance Comes TogetherSM,” a branded site where businesses can access and leverage the firm’s AccuComplianceSM Suite of outsourced compliance solutions. Whether your business needs to incorporate, register as a service provider with a government regulatory agency, or register to pay communications taxes or maintain compliance once properly registered, the AccuComplianceSM Suite has your business need covered.

- AccuLicenseSM – Licenses & Registrations
- AccuRegSM – Regulatory Compliance
- AccuTaxSM – Communications Tax/911 Compliance

- AccuCorpSM – Corporate Compliance
- AccuAgentSM – Registered Agent Services

And for any company that isn’t certain which registrations, authorizations, and licenses it needs or what compliance obligations apply to their business operations, there is a “Compliance Wizard” software application that allows users to go through an intuitive, easy to use Q&A process to obtain a report detailing the applicable requirements. They can even purchase and manage all of their compliance needs directly from the www.TheComplianceSquare.com website.

While the heart and soul of TCG remains its commitment to employing only the most seasoned, well qualified and customer service centric consulting professionals, the future lies in the firm’s unique ability to fuse best of breed professional services with state of the art software and database solutions. Software can never replace the personal touch, sensitivity, and care that comes from the relationship between a client and experienced professional. And TCG goes above and beyond to continue earning high marks for its customer service, as a current customer recently affirmed, “I’m very impressed with [TCG’s] attention to customer service,” Karina K. Tiwana, Esq., General Counsel, Alcatel Lucent Enterprises USA (August 13, 2020).

Software does, however, add immeasurable benefits, such as:

- Added efficiencies leading to lower costs
- Increased ease of use
- Layers of security and data protection
- Robust document management
- Audit and due diligence readiness and efficiency
- Customer contact and communication
- Data analytics capabilities

TCG captures all of these benefits, and more, through its AccuComplianceSM SaaS-based compliance platform.

AccuComplianceSM One Small Step for Man, One Giant Leap for Outsourced Compliance

The robust tools and services of TCG has positioned it as an innovator and thought leader in the market today. One of the most powerful tools from the company is AccuComplianceSM– a one of a kind, comprehensive compliance software platform. Believing in the power of combining professional experience with software, TCG has melded the unique, experiential knowledge and nuanced risk sensitivities of experienced telecom lawyers with its robust, highly intuitive software platform, AccuComplianceSM. In a market where several solution providers are delivering compliance solutions in the old fashioned and highly manual way, AccuComplianceSM brings an entirely different and revolutionary model to the field.

The solution is built from the ground up to ensure accurate, thorough, and timely compliance with USAC’s FCC Form 499-A. The company’s product catalog of regulated and

unregulated services is first mapped into AccuComplianceSM, and then aligned with the company's books and records. The platform then ensures that the compliance filings are aligned with any bundled revenue allocations and that other "optimizations" implemented by each business before filing, are prepared and filed on time, every time. An optimization typically involves accounting methods, traffic studies, and other evidence required to support the most favorable treatment of a company's services, ultimately subjecting service providers and their customers to lower passthrough surcharges and taxation burdens.

The solution also serves as a "USAC Audit Avoidance System" by providing users with advance notice any time a company's reporting materially diverges from prior periods and it warns users before data is ever filed. The best way for telecom companies to avoid a USAC audit is to avoid triggering "Red Flags" in its EFile System. Once a red flag is raised, the prying and suspicious eyes of the auditors are more difficult and costly to appease.

Among the many features embedded in AccuComplianceSM is its ability to help small telecom companies closely manage the pros & cons of the FCC's so called "De Minimis" exemption. The robust and intuitive logic built into the software will help these businesses avoid double taxation, which can happen when a de minimis company pays its supplier pass through surcharges and is also directly being invoiced by USAC.

TCG's entire approach to compliance stands apart from every other outsourced compliance vendor or solution in the marketplace because it is the only solution that starts with "Regulatory Fees" compliance as its foundation. Most other solutions vendors come from the "Sales Tax" or "Accounting" fields, not "Regulatory." There are significant and very impactful distinctions in the way revenue is subjected to Regulatory Fees compared to revenue reporting for Sales Tax purposes. TCG doesn't try to squeeze a square peg through a round hole. When

"tax data" is the sole basis for "regulatory" reporting, you can rest assured, something is amiss in your company's regulatory filings. But by creating a clearly delineated bifurcation of its "Regulatory" and "Tax" reporting functions and ensuring the accuracy of the underlying data entering its AccuComplianceSM platform, TCG helps its customers report revenue correctly and as optimized as possible. And always based on application of the distinct rules governing the "taxability" and "regulatory fee assessments" there is a difference! Something far too many of TCG's competitors simply ignore or neglect to tackle.



Once your company's product catalog of regulated and unregulated services is mapped into AccuComplianceSM using a professionally-guided, 'best practices' onboarding process, your company can rest easy knowing that its compliance filings will not only be filed on time, but with confidence that the data being reported is accurate and optimized to minimize government fees and taxes

No More "Garbage In, Garbage Out" Thanks to Professionally Delivered, Skills-Based Onboarding Services

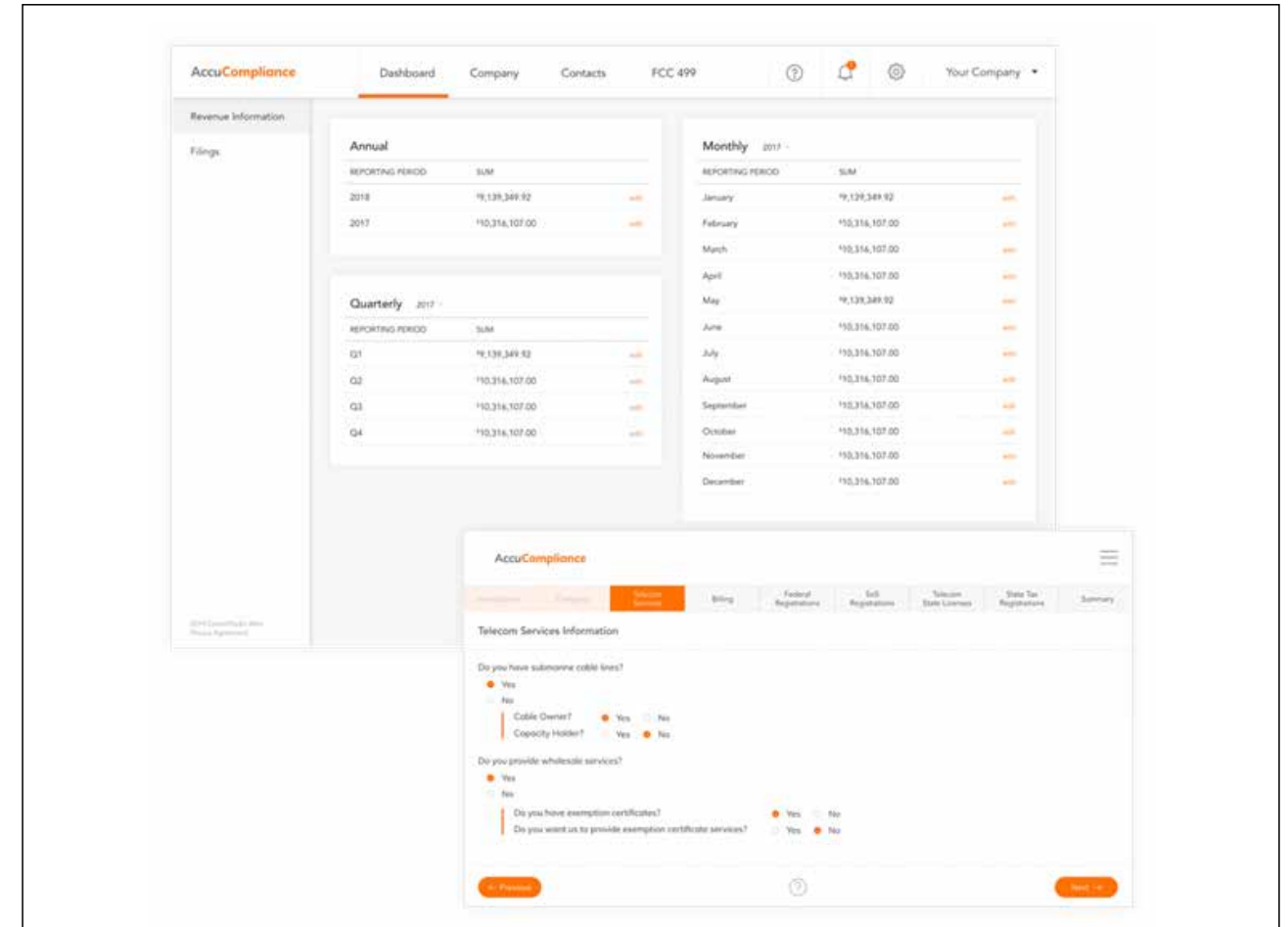
They say software, no matter how good, is only as good as the person using it. Which, according to Marashlian, is why "hiring an accounting firm that uses their knowledge about 'taxes' and who rely on 'tax' data plugged into software that's been built for 'tax' compliance and expecting

your 'regulatory' compliance to be done correctly is not just risky, it's downright foolhardy."

TCG engineered its AccuComplianceSM platform to address and overcome the differences between regulatory and tax compliance reporting. But software, alone, simply is not enough. The firm is also staffed by professionals who possess indepth, yet distinct qualifications in the fields of communications taxation and regulatory fees, all led by managers and directors with 25 plus years of hands on industry experience. And when TCG's professionals are teamed up with attorneys from The CommLaw Group's Communications Taxes & Fees practice group for a professionally guided, "best practices" onboarding experience, businesses can be confident that they are set up for success straight out of the gates, not failure and future heartache.

TCG solved the garbage in, garbage out dilemma by developing a "Full Spectrum" approach to compliance which can be summed up by one of Marashlian's catch-phrases, "we put the right people, on the right job, for the right price," which he has recently augmented with "using the right technology." TCG is the 'go to' outsourced compliance vendor of telecom businesses that want to do things right, but also affordably and competently. The group specializes in fulfilling the objectives of telecom businesses that wish to minimize their exposure to risk without sacrificing business opportunities or incurring wasteful costs. With its foundation in expert telecom attorney knowledge gained through more than fifteen years of USAC audit representation and experience, TCG provides clients with a competitive advantage while reducing compliance related expenses and exposure to risk. The company helps clients be compliant when entering the market and "fix" areas of their operations that were not well conceived at the outset.

Currently, nearly 200 telecom businesses are using TCG and its AccuComplianceSM solution to help manage their compliance with the FCC's complex



and ever shifting reporting requirements. According to Marashlian, "about three quarters of our customers I would consider to be 'small to medium sized' telecom businesses, with annual revenues between \$50,000 to a few million dollars... ten percent likely land in the 'large enterprise'/Fortune 1000 range... and the balance are brand new entrants." TCG's clients include providers of VoIP, wireless and traditional telecommunications services, SaaS-based and "cloud computing" technologists, IoT application and network vendors, and nearly every imaginable 21st Century business driving the Digital Revolution.

Having helped hundreds of businesses tackle their compliance management needs, TCG is setting a new benchmark for its competitors. The US-based firm now looks forward to launching a website that will enable telecommunication service providers to solve many of the intricate challenges associated with ensuring compliance with regulations and regulatory filings in today's unprecedented era of technological convergence and the regulatory uncertainties that come with disruption.

With the launch of its AccuComplianceSM SaaS offering (available at www.TheComplianceSquare.com and also at www.AccuCompliance.com) and through strong relationships with

industry leading tax and billing vendors, the likes of Avalara, SureTax, Rev.io, and Datagate, to name a few, TCG is an integral part of the compliance outsourcing ecosystem that is essential to telecom operators selling services that no longer adhere to geographic boundaries. TCG is well positioned to continue its rise to the top ranks of outsourced compliance solutions providers and earning its status as one of the 10 Most Promising Telecom Consulting Service Companies of 2020, according to CIO Review.

"We look forward to welcoming customers to TCG's Compliance Square, which is where compliance comes together through our AccuComplianceSM Suite of solutions!," says Marashlian, who concludes with an invitation to "come visit our new website, where you can register and take our revolutionary SaaS-based outsourced compliance solution platform out for a no obligation test drive."

In order for compliance to become as ubiquitous and common as is the ability to communicate itself, compliance must be an opportunity and not merely a cost. The future of outsourced compliance in the communications industry is the "Full Spectrum" of compliance available from TCG, through its Compliance Square site and AccuComplianceSM solutions. 