

# Robocall Mitigation Program Description

Rocket Referrals LLC DBA ClientCircle

## Introduction

ClientCircle is a provider specializing in facilitating text messaging services for various business clients. Specifically, our platform does not enable users to engage in any form of automated calling. Voice services are solely used to forward incoming calls to our text messaging lines to a customer's verified number.

This document outlines our robocall mitigation program tailored to our specific operational model.

## Customer Verification Process

To mitigate the risk of facilitating illegal robocalls, ClientCircle implements rigorous customer verification procedures. These procedures include:

1. **Identity Verification:** All customers are required to undergo an identity verification process before being granted access to our services. This process involves confirming the authenticity of business documents and the identity of individuals authorized to act on behalf of the business.
2. **Use Case Verification:** We require all customers to provide detailed information about their intended use of our text messaging services. This information is reviewed to ensure compliance with legal standards and our company policies.
3. **The Campaign Registry:** ClientCircle integrates with The Campaign Registry to verify the business use cases of our clients. This partnership ensures that our services are utilized for legitimate purposes and in compliance with industry standards.
4. **Third-Party Verification for 800 Numbers:** We engage an independent third-party verification company to specifically verify the use and ownership of 800 numbers.

## Collaboration with Service Providers

ClientCircle uses Bandwidth as our primary telecommunications service provider. Our partnership with Bandwidth is grounded in a mutual commitment to prevent illegal robocall activities. As part of this collaboration, we adhere to Bandwidth's guidelines for robocall mitigation and participate in any necessary compliance and monitoring activities. As such any originating call from our platform will be signed with an A attestation.

## Monitoring and Compliance

As part of our terms of use and our text messaging monitoring, our robocall mitigation program includes continuous monitoring of traffic patterns and customer activities to identify potential misuse of our services. We have established protocols for investigating suspicious activities and take immediate action to address any identified risks, including suspending or terminating services when necessary.

## Cooperation with Law Enforcement and Industry Initiatives

ClientCircle is committed to cooperating with law enforcement agencies and participating in industry initiatives aimed at combating illegal robocalls. We respond promptly to traceback requests and actively engage in information sharing to support efforts to trace and eliminate unlawful robocall campaigns.

## Program Oversight and Review

Our robocall mitigation program is overseen by the CEO and leaders in the information technology team. The program is reviewed on a regular basis, and adjustments are made in response to evolving threats and regulatory requirements.

## Conclusion

ClientCircle is dedicated to maintaining the integrity of our text messaging and voice services and protecting consumers from the harms associated with illegal robocalls. Through rigorous customer verification, continuous monitoring, and active collaboration with our partners and regulatory bodies, we are committed to upholding the highest standards of service and compliance.