

Robocall Mitigation Plan

 Owner	 Will
 Tags	IT/Security IVR Phone Numbers
 Verified	 Verified by @Will
 Last Reviewed	@February 18, 2026 9:11 AM

ProMedia, Inc.

FCC RMD ID: RMD0006978

1. Company Overview

ProMedia, Inc. is a direct response media and advertising agency that operates a proprietary in-house call routing technology built on Twilio and Bandwidth infrastructure.

Our platform functions solely to receive inbound calls from consumers responding to television advertisements and route those calls to pre-approved client call center destinations. We do not operate outbound calling campaigns, predictive dialers, or automated mass calling systems.

2. STIR/SHAKEN Implementation Status

ProMedia does not operate its own facilities-based network and relies on our upstream providers for STIR/SHAKEN call authentication.

We originate limited calls exclusively through Twilio and Bandwidth, both of which fully implement STIR/SHAKEN on the IP portions of their networks. As such, all outbound calls we originate are signed and authenticated by these carriers.

3. Know Your Customer (KYC) Procedures

Although our platform architecture prevents misuse for illegal robocalling, we nonetheless implement verification procedures for all clients.

We use internal procedures to vet all clients and do not use third-party vendors for customer verification. Our vetting includes business entity verification, contractual requirements for legal compliance, and ongoing monitoring of client relationships and call patterns.

4. Robocall Prevention Measures

Outbound Call Restrictions

ProMedia's call routing platform is designed exclusively for inbound call handling and cannot be used by customers to originate outbound calls. This architectural limitation is our most fundamental safeguard against TCPA violations. Our clients physically cannot use our platform to place robocalls, autodial consumers, or conduct outbound telemarketing campaigns of any kind.

Our only outbound calls are controlled test dials placed to verified client call center numbers solely to confirm connectivity and call quality.

Inbound Spam Mitigation

Although our platform primarily handles inbound consumer calls, we have implemented measures to detect and block bad actors who attempt to abuse our toll-free numbers:

Real-Time Call Analytics:

We utilize an internally developed call analytics system to monitor traffic patterns and detect anomalous behavior. We do not use third-party analytics vendors. Our system includes:

- Continuous monitoring of call volume and frequency patterns as calls are processed
- Automated flagging of unusual call behavior indicative of spam or fraud

Automated Blocking:

- Any caller exceeding 7 calls per minute is automatically classified as a spammer and added to our blocklist
- Once blocklisted, all subsequent calls from that caller are rejected immediately
- Clients may also request that specific callers be added to the blocklist

Technical Safeguards

Code Review:

All source code changes to our call routing platform undergo mandatory review before deployment, ensuring malicious code or unauthorized functionality is identified and prevented from reaching production.

Access Controls:

Platform access is restricted through least-privilege principles, with changes limited to authorized personnel only.

5. Cybersecurity and Fraud Mitigation

Our primary risk is account compromise that could be exploited for outbound robocalling. To mitigate this risk, we employ industry-standard security measures, including:

- **API key rotation** on a scheduled basis.
 - **Two-factor authentication** for all account access.
 - **Least-privilege access control** for staff and systems.
 - **Continuous monitoring** for unusual traffic or login attempts.
 - **Immediate revocation of compromised credentials** if detected.
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6. Upstream Provider Oversight

Our only upstream providers for call origination are Twilio and Bandwidth, which we use solely for limited test calls to verify connectivity. We maintain the following procedures to know our upstream providers:

- We maintain direct, verified account relationships with both Twilio and Bandwidth
 - We have confirmed that both providers are registered in the Robocall Mitigation Database and maintain current, compliant filings
 - We do not accept traffic from any other upstream voice providers
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7. Traceback Response Commitment

ProMedia Inc. commits to fully responding to traceback requests from the FCC, USTelecom, or law enforcement within 24 hours of receipt. We have designated the following point of contact:

- **Name:** Will Sabol
 - **Title:** VP of Technology
 - **Email:** will@promedia.com
 - **Phone:** (800) 814-6037
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8. Ongoing Compliance Practices

In order to maintain compliance with all FCC robocall mitigation requirements, we have established the following practices:

- Annual reviews of this Robocall Mitigation Plan
 - Maintaining relationships only with compliant upstream providers
 - Enforcing security best practices to prevent unauthorized use of our platform
 - Providing training for staff handling call routing systems on compliance and security
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Certification Statement

ProMedia, Inc. certifies that:

1. We have implemented the above-described robocall mitigation program.
 2. All calls we originate are subject to these mitigation measures.
 3. We will respond fully and within 24 hours to any traceback requests.
 4. We will maintain and update this plan as necessary to reflect compliance with FCC rules and best practices.
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Signed:

Will Sabol

Prior actions and investigations:

- August 25, 2025 - ProMedia Inc. was removed from the Robocall Mitigation Database pursuant to Enforcement Bureau Order DA 25-737 for failure to update its certification by the February 26, 2024 deadline. ProMedia did not receive the FCC's compliance notifications because the designated contact was an employee who left the company in June 2023, and ProMedia failed to update its RMD contact information or establish monitoring procedures for that email address. Upon learning of the removal on August 26, 2025, ProMedia immediately submitted a revised Robocall Mitigation Plan and updated certification, and the Enforcement Bureau provisionally reinstated the company's filing on August 29, 2025. No findings of illegal robocalling, spoofing, or other substantive wrongdoing were made against ProMedia. The company has since updated its contact information and implemented internal procedures to ensure ongoing compliance with FCC requirements.