

Robocall Mitigation Plan Gelenk Networks Inc.

1. Company Overview

- **Company Name:** Gelenk Networks Inc.
- **Country:** Canada
- **FCC Robocall Mitigation Database Registration:** [Registered](#)
- **Service Type:** Direct-to-End-Consumer Provider of Voice-Enabled Mobile Applications

2. Purpose of the Plan

Gelenk Networks Inc. is committed to preventing the origination and transmission of illegal robocalls while ensuring compliance with the Federal Communications Commission (FCC) regulations. Given the challenges associated with STIR/SHAKEN implementation, we have adopted a robust alternative mitigation strategy to identify and prevent illegal robocall traffic.

3. Robocall Mitigation Measures

3.1. Call Traffic Monitoring & Blocking

- A designated team to monitor real-time analytics and filtering to detect and block suspicious call traffic.
- Monitor high-volume, short-duration calls indicative of robocall activity.
- Enforce **limited concurrent calls**, allowing only a **small number of simultaneous calls** to prevent robocalling.

3.2. Know Your Customer (KYC) & Due Diligence

- Conduct rigorous vetting of new cloud PBX customers, requiring valid business documentation and intended usage disclosure.
- Periodically review existing customer call patterns for anomalies.
- Implement strict policies against misrepresentation of caller IDs.
- A phone number and/or email address are required for registration. OTP (One-Time Password) is sent to verify the end user's phone number or email.
- High-risk countries are blocked based on IP address.
- Name and address are needed if an end-user account subscribes to more than three numbers.

3.3. Traceback Cooperation & Record-Keeping

- Fully cooperate with **US Telecom's Industry Traceback Group** and promptly respond to traceback requests.
- Maintain "call detailed records" for audit and law enforcement investigations.

3.4. Traffic Restrictions & Policy Enforcement

- Restrict high-volume, short-duration traffic unless the customer is verified.
- Require customers to acknowledge and comply with all FCC robocall mitigation regulations.
- No SIP trunking is available to self-registered users. These services are only offered to businesses with a designated account manager.
- Currently, we don't have any outbound call centre (telemarketing) clients.

3.5. Internal Systems & Fraud Prevention

- **IPinfo Integration:** Helps determine potential location and whether an IP address is linked to a home, VPN, or proxy.

Third party tool for VPN detection: <https://proxycheck.io> and <https://vpnapi.io>

- **Internal Monitoring Tools:** If suspicious activities are detected, actions such as reCAPTCHA verification, or account suspension may occur.
- **Rate Limiting:** Basic rate limiting is applied to prevent bot exploitation of sensitive routes.

3.6. Regular Audits & Compliance Measures

- Conduct regular internal audits to identify and address potential compliance gaps.
- Implement training programs for employees on robocall mitigation policies.
- Submit periodic compliance reports to the FCC as required.

4. Compliance Assurance & Continuous Improvement

Gelenk Networks Inc. is committed to continuously improving its robocall mitigation efforts. We will regularly update our mitigation strategies based on emerging threats, regulatory changes, and industry best practices. Our dedicated compliance team will oversee enforcement and implementation to ensure adherence to FCC requirements.

5. Contact Information for Compliance Inquiries

- **Compliance Officer:** Bing Li
- **Email:** bing.li@gelenknetworks.com
- **Phone:** 905-760-9070
- **Address:** 600 Alden Road suite 312. Markham, Ontario, Canada L3R0E7

This plan is submitted in accordance with the FCC's robocall mitigation requirements and serves as a declaration of our commitment to combating illegal robocalls.