

Robocall Mitigation Plan

CallRail, Inc.

Overview

CallRail is an AI-powered lead intelligence platform based in the U.S. It makes it easy for businesses to centrally track and record calls, monitor website performance, and view analytics for all business leads. CallRail is committed to providing its services in accordance with legal and regulatory requirements and works closely with its carriers to ensure the FCC's VSP requirements are met. CallRail submits the following Robocall Mitigation Plan in compliance with 47 CFR § 64.6305(d)(ii)

Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls:

CallRail Customers must accept and comply with the Acceptable Use Policy ("AUP") outlined in our [Terms of Use](#) which requires the Customer not to misuse the CallRail platform or violate any local, state, or federal laws, or regulations. Customers that violate our AUP may have their service suspended or closed.

Description of Analytics to Block Illegal Traffic:

Prevention

Each account created is automatically reviewed for suspicious criteria. While every account must verify an email address with us, those deemed suspicious are then required to verify additional details including but not limited to:

- Business Address
- Business Phone Number
- Industry
- Website if applicable

Monitoring

All accounts have usage parameters based on anticipated traffic. These parameters allow us to identify potential misuse based on observed fraudulent usage patterns. Pending investigation, accounts may be suspended or closed.

Remediation

Customers violating our terms of service are sometimes eligible for a one-time remediation plan. This requires a recommitment to our terms of service, acknowledgment of wrongdoing, and submission of a detailed plan for avoiding further violations. When a remediation plan is in place, any concurrent violations of our terms of service result in account closure.

Know Your Customer Practices:

CallRail collects identifying information for each account during the billing process. This information includes the individual's name, business name, and mailing address.

Know Your Upstream Provider Practices:

CallRail utilizes Twilio and Bandwidth as its providers. CallRail partners with these providers' compliance teams to promptly respond to any violations of law related to fraudulent calling and perform applicable remediation measures.

Commitment to Respond to Traceback Requests:

CallRail is willing and able to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

This Robocall Mitigation Plan describes the specific measures that CallRail has implemented as of April 3, 2024. CallRail continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed.