



Robocall Mitigation Plan for DealerPeak- 2024

Company Overview: DealerPeak, Inc. (“DealerPeak”) provides voice communication services as part of its SaaS CRM platform for commercial customers. DealerPeak does not directly own or control switching platforms or connections to the PSTN but relies on third-party providers, such as Bandwidth.com and Twilio.com, for these services.

The DealerPeak software system does not have any features or abilities that would allow or make robocalls, although as we state below we do have safeguards in place for ensuring there are no scenarios where a customer could abuse the system in this or other ways.

Rule Exemption: DealerPeak, Inc. certifies compliance under 47 CFR § 64.6305(a) by implementing a robust robocall mitigation program in lieu of direct STIR/SHAKEN implementation. DealerPeak previously operated under a temporary extension granted under 47 CFR § 64.6304. DealerPeak does not qualify for a permanent exemption from STIR/SHAKEN but complies with the FCC’s requirements through alternative means.

Explanation of Applicability: DealerPeak does not own or operate any switching facilities or direct Public Switched Telephone Network (PSTN) connections. Instead, DealerPeak relies entirely on upstream providers, such as Bandwidth.com and Twilio.com, which are fully compliant with the STIR/SHAKEN authentication framework. This operational model prevents DealerPeak from implementing STIR/SHAKEN directly but ensures all traffic is routed through compliant providers.

1. STIR/SHAKEN Implementation

DealerPeak’s third-party providers, Bandwidth.com and Twilio.com, are fully compliant with STIR/SHAKEN standards. DealerPeak is committed to ensuring all voice traffic originated through its platform is routed through these compliant providers.

DealerPeak does not directly implement STIR/SHAKEN on its network as it does not own switching platforms. However, DealerPeak monitors compliance with STIR/SHAKEN through agreements and regular checks with its providers.

2. Robocall Mitigation Measures

A. Verification of New and Renewing Customers

DealerPeak's software system does not have any features or abilities that would allow or make robocalls. However, DealerPeak implements the following measures to ensure that customers do not use its platform for any practices that are unlawful or against compliance dictated by FCC or other relevant compliance requirement:

- **Customer Vetting:** Conduct thorough reviews of customer identity, business purpose, and traffic patterns before onboarding.
- **Terms of Service Enforcement:** All customers must agree to DealerPeak's Terms of Service, which strictly prohibit using the platform for illegal robocalling activities.
- **Periodic Reviews:** Perform regular audits of existing customers to confirm adherence to compliance standards.

B. Call Monitoring and Analytics

DealerPeak utilizes advanced monitoring techniques and relies on its providers' call analytic systems to detect and flag suspicious call patterns. Specific steps include:

- **Traffic Analysis:** Monitor outbound call logs for high call volume, repetitive dialing patterns, or other indicators of potential illegal activity.
- **Third-Party Tools:** Leverage Bandwidth.com and Twilio.com's robust analytic systems to identify and block flagged calls.

C. Response to Illegal Traffic Notifications

- **Immediate Action:** Upon receiving a notification of suspected illegal traffic from the FCC, law enforcement, or a traceback consortium, DealerPeak will:
 - Suspend the relevant customer's account.
 - Collaborate with its providers to investigate and mitigate the issue.
 - Terminate services for any customer found to be in violation.

3. Traceback Commitment

DealerPeak has designated a contact for handling traceback requests and commits to responding fully and within 24 hours to all requests from the FCC, law enforcement, and the Industry Traceback Consortium.:



- **24-Hour Response:** DealerPeak will respond to all traceback requests within 24 hours.
 - **Designated Contact:**
 - **Name:** Chris Phillips
 - **Title:** Head of Engineering
 - **Contact:** 503.274.8031 x7109
 - **Email:** software@dealerpeak.com
 - **Alternate Contact**
 - **Name:** Michael Ashbaugh
 - **Title:** COO
 - **Contact:** 330-807-9118
 - **Email:** ash@dealerpeak.com
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4. Certification Information

A. Company Information

- **Business Name:** DealerPeak, Inc.
- **Address:** PO Box 25626, Portland OR 97298
- **Primary Contact:** Matt Moore, CEO (Contact: 530-682-0433)
- **Alternate Contact:** Michael Ashbaugh, CEO (Contact: 330-807-9118)

B. Compliance with FCC Rules

DealerPeak affirms compliance with 47 CFR § 64.6305(a) by:

1. Ensuring all calls are routed through upstream providers that are fully STIR/SHAKEN compliant.
2. Implementing a comprehensive robocall mitigation program as described above.

C. Legal Compliance and History

DealerPeak affirms:

- It has not been subject to any FCC or law enforcement actions related to illegal robocalling or deficiencies in its RMD certification in the past two years.
 - It remains compliant with all FCC rules and regulations.
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5. Future Enhancements

DealerPeak recognizes the evolving nature of robocall mitigation and commits to:

- Regularly updating its mitigation plan to incorporate new technologies and practices.
- Conducting ongoing training for staff on compliance and mitigation strategies.

Conclusion: DealerPeak submits this updated Robocall Mitigation Plan in compliance with FCC rules and directives. This document reflects our continued commitment to preventing illegal robocalling and ensuring compliance with industry standards.