
LEADFERNO LLC

ROBOCALL MITIGATION PROGRAM DESCRIPTION

FRN: 0031566300

Adopted: 19 August 2026 | Last reviewed: 8 September 2026 | Version: 1.8

1. Company Overview & Scope

Leadferno LLC ("Leadferno") is a software provider of two-way business messaging, web-to-text conversion widgets, and lead-capture tools for small and medium-sized businesses. Leadferno's customers are businesses that use Leadferno's application to communicate with their own customers, primarily by text message.

Leadferno operates no telephony network. It owns and operates no switching equipment, session border controllers, media gateways, or Internet Protocol networks over which voice traffic is carried. All voice transport, call routing, and interconnection with the Public Switched Telephone Network is performed by Leadferno's underlying carrier partner, Bandwidth Inc. ("Bandwidth"), on that carrier's own network.

Where a telephone number hosted for a Leadferno customer receives an inbound voice call, that call is forwarded to a destination number the customer has configured. That forwarding is executed by Bandwidth, on Bandwidth's network, pursuant to routing configuration data supplied by Leadferno's software. No voice traffic traverses facilities owned, operated, or controlled by Leadferno. Leadferno does not originate outbound voice traffic over the Public Switched Telephone Network.

Leadferno has no outbound calling capability. Leadferno does not originate voice calls, and its customers cannot originate voice calls through Leadferno's platform. No feature, interface, or application programming interface exists by which a voice call may be placed.

2. STIR/SHAKEN Implementation Status

Leadferno is unable to implement the STIR/SHAKEN authentication framework because it does not control the network infrastructure necessary to do so, as provided in 47 C.F.R. § 64.6305(d)(2)(i).

Section 64.6301(a) requires a voice service provider to implement the STIR/SHAKEN framework "in its internet Protocol networks," and § 64.6301(a)(2)(ii) requires authentication of caller identification information for SIP calls that the provider "originates and exchanges with other voice service providers or intermediate providers." Leadferno operates no Internet Protocol networks over which voice traffic is carried and originates no SIP calls. Neither condition is present.

Leadferno is likewise not an intermediate provider within the meaning of 47 C.F.R. § 64.6300(g), which reaches an entity that carries or processes traffic insofar as it neither originates nor terminates that traffic. Leadferno neither carries nor processes voice traffic; inbound call forwarding is executed on Bandwidth's network from routing configuration supplied by Leadferno's software.

On August 21, 2026, Leadferno obtained Operating Company Number 417H, category IPES, from the National Exchange Carrier Association. Leadferno has not registered with the STI Policy Administrator, holds no Service Provider Code token, and holds no STIR/SHAKEN certificate. Leadferno has not been granted numbering authorization under 47 C.F.R. § 52.15(g)(3) and obtains no numbering resources directly from the North American Numbering Plan Administrator or the Pooling Administrator. Leadferno originates no voice traffic.

Calls associated with Leadferno-hosted numbers are authenticated by Bandwidth on its own network under its own certificate. Leadferno states this as a description of the call path, not as the basis for its own compliance.

Leadferno will amend this description and its certification within ten business days of any change in these facts.

3. Customer Due Diligence and Know Your Customer (KYC)

Leadferno's service is business text messaging. Numbers provisioned to customers are used for two-way SMS and for inbound voice calls forwarded to a destination the customer configures. Because Leadferno provides no outbound calling capability, the vetting below is directed at preventing abuse of messaging and of inbound number assignment.

3.1 Third parties used in verification

- The Campaign Registry (TCR). All customer brands using 10DLC numbers are registered and vetted through TCR, and messaging campaigns are registered and reviewed for use case, content, and opt-in method before messaging traffic is enabled.

- **Bandwidth Inc. Toll-Free Verification.** Where a customer uses a toll-free number for messaging, Leadferno submits that number through Bandwidth's toll-free verification process, which requires disclosure of the business, use case, message content, opt-in method, and expected volume, and which must be approved before messaging traffic is permitted.
- **Stripe.** Payment instruments are verified through Stripe, which performs card and account verification and supplies associated identity and fraud signals.

Leadferno uses no third-party call analytics vendor. Leadferno originates no voice calls and performs no call analytics.

3.2 New customers

Before a telephone number is provisioned to a customer or call forwarding is enabled:

- Leadferno collects and validates the legal business name, physical address, Tax ID/EIN, and company owner/executive contacts.
- The identified owner or executive contact is confirmed as authorized to act for the business.
- The payment instrument is verified through Stripe.
- Where a 10DLC number is used, the brand is registered and vetted through TCR, and each messaging campaign is registered with its use case and opt-in method.
- Where a toll-free number is used, Bandwidth's toll-free verification must be completed and approved.
- Where a customer asks to use a number it already controls, a Letter of Authorization demonstrating right to use is required.
- The customer must accept Leadferno's customer agreement, which incorporates an Acceptable Use Policy prohibiting illegal robocalling, unlawful caller identification spoofing, and unlawful or deceptive content, and which reserves Leadferno's right to suspend or terminate service immediately upon violation.

3.3 Existing customers

Leadferno applies its Know Your Customer framework to accounts already in service as follows:

- **Back-verification of the existing base.** Leadferno has applied the verification practices described in Section 3.2 to accounts already in service on an ongoing basis since December 2025, prior to those practices being reduced to this written policy. Under this policy, Leadferno is conducting a documented review of all 230 accounts currently in service against the standards in Section 3.2, to be completed by September 15, 2026.

Accounts that do not complete verification will be marked inactive and their telephone numbers withdrawn.

- **Trigger-based re-verification.** Full re-verification is performed when an account requests a significant increase in telephone numbers, materially changes its messaging volume or pattern, is the subject of a traceback request or a carrier or consumer complaint, adds or changes a toll-free number, or changes ownership or control.
- **Periodic review.** Every account is reviewed against current standards no less than annually.
- **Registry currency.** TCR brand and campaign registrations are kept current, and campaigns are re-submitted when a customer's use case changes.

3.4 Know your upstream provider

Leadferno obtains all telephone numbers and all voice and messaging transport from Bandwidth Inc., a facilities-based provider listed in the Robocall Mitigation Database. Leadferno's agreement with Bandwidth requires Leadferno's compliance with applicable law and with Bandwidth's acceptable use requirements, and Bandwidth's messaging and toll-free verification processes apply to traffic on Leadferno-provisioned numbers. Leadferno has no other upstream voice or messaging provider.

4. Traffic Monitoring and Detection

Leadferno monitors account activity for indicators of illegal or abusive use, including:

- Volume and velocity thresholds applied per account, with review of accounts that exceed them.
- Complaint volume and opt-out rate monitoring across messaging traffic.
- Carrier feedback, including message blocking or filtering notifications received from Bandwidth or downstream carriers.

Accounts exceeding established thresholds are placed under manual review by Leadferno's support team within 24 hours and may be rate-limited or suspended pending investigation.

5. Traceback Cooperation

Leadferno is fully committed to maintaining the integrity of the telecommunications network. Leadferno commits to responding fully and within 24 hours to all traceback requests from the Federal Communications Commission (FCC), law enforcement agencies, and the Industry

Traceback Group (ITG), and to cooperating with such entities in investigating and stopping any illegal robocallers.

24/7 Traceback Contact Information

- **Primary:** Joel Headley, Co-founder, joel@leadferno.com, +1 (650) 440-1509
- **Monitored alias:** support@leadferno.com
- **Backup:** Aaron Weiche, Co-founder, aaron@leadferno.com, +1 (612) 310-6333

Leadferno has not received a traceback request to date.

6. Enforcement & Mitigation Measures

Where potential illegal robocalling, spoofing, or fraudulent call activity is detected, reported, or identified via traceback request, Leadferno takes the following action:

1. **Account Suspension:** The account is immediately suspended pending investigation.
2. **Investigation:** Leadferno reviews the account's traffic, registration records, and onboarding credentials.
3. **Termination of Service:** Where illegal activity or a violation of the Acceptable Use Policy is confirmed, Leadferno terminates service immediately and blocks further traffic.
4. **Upstream notification:** Leadferno notifies Bandwidth and, where applicable, the Industry Traceback Group of the action taken.
5. **Prohibition on re-entry:** Terminated customers and their principals are recorded and blocked from re-onboarding under a new account.

7. Recordkeeping

Leadferno retains customer onboarding and verification records, Letters of Authorization, TCR and toll-free verification records, message and call detail records, and records of enforcement actions taken, for a period of not less than three years, in a form sufficient to permit Leadferno to respond to traceback requests and to inquiries from the Commission and law enforcement.

8. Program Governance

This program is owned by Joel Headley, Co-founder & Head of Product & Engineering. It is reviewed no less than annually and upon any material change to Leadferno's service model, its underlying carrier relationships, or the applicable rules of the Commission.

Joel Headley is responsible for the continued accuracy of Leadferno's Robocall Mitigation Database certification and for filing an amendment within ten business days of any change to the information in this description or in Leadferno's certification, as required by 47 C.F.R. § 64.6305.

9. Certification

I certify that I am an officer of Leadferno LLC, that I have examined this robocall mitigation program description, and that the statements in it are true, complete, and correct to the best of my knowledge, information, and belief.

Signature



Joel Headley
Co-founder & Head of Product &
Engineering, Leadferno LLC

Date

September 8, 2026
