



AUM LLC Robocall Mitigation Program Description

Provider Information

AUM LLC provides a hosted SaaS-based omni-channel marketing automation platform using voice, email, and SMS, serving both end-users and select wholesale partners.

STIR/SHAKEN Status

All outbound calls to the PSTN are routed through upstream providers who perform STIR/SHAKEN authentication. AUM LLC does not directly interconnect with the PSTN or operate its own signing infrastructure.

1. Know-Your-Customer (KYC) Procedures

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

In addition, AUM LLC requires each customer to:

- Provide full legal business information, including registered business name and valid Tax Identification Number (TIN).
- Submit a government-issued photo ID of an authorized representative.
- Complete a live selfie for identity verification.

We use a trusted third-party verification provider to:

- Authenticate the submitted information.
- Confirm the legitimacy of the business entity.
- Match the government-issued ID to the live selfie.

Accounts that fail any part of the verification process are denied service.

2. Practices to Avoid Originating Illegal Robocall Traffic

AUM LLC enforces strict procedures to prevent its network from being used for illegal robocall campaigns. These include:

- Customer vetting before service activation (detailed in Section 2, above).

- Limiting high-volume or high-risk traffic until a customer demonstrates a compliant call history.
- Restricting campaigns that target high-risk number ranges or violate applicable telemarketing laws.
- Suspension or termination of accounts exhibiting suspicious patterns, such as short-duration bursts or high call-per-minute rates to unverified destinations.

3. Ongoing Network Monitoring

AUM LLC continuously monitors call traffic patterns to detect indicators of unlawful activity, including:

- High call volumes with low average call duration.
- Call spikes to known high-risk or unassigned number ranges.
- Traffic patterns inconsistent with the customer's stated use case.

Any traffic flagged by our monitoring system is reviewed immediately. Accounts sending suspicious traffic may be suspended or terminated pending investigation.

In addition, we have implemented a Call Abuse Policy and have published the following policy, terms of use, and have notified our customers of the policy as copied below:

"Any call originated on the AUM network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the AUM network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court."

4. Traceback Cooperation

AUM LLC is fully committed to cooperating with traceback requests from the Industry Traceback Group (ITG) and authorized government agencies and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

5. Commitment to Compliance

AUM LLC is committed to full compliance with 47 CFR § 64.6305 and will:

- Keep its Robocall Mitigation Database certification accurate and up-to-date.
- Update this mitigation plan as network conditions or mitigation practices change.
- Continue to work with upstream providers to ensure outbound traffic is properly signed and authenticated.