



Robocall Mitigation Plan for J14 Marketing

1. Business Overview

J14 Marketing provides voice communication services as a reseller of voice services, relying on Inteliquent as our upstream Voice Service Provider (VSP) for call routing and STIR/SHAKEN implementation. We have designed our call management platform through ViciDial to restrict any form of autodialing, predictive dialing, or prerecorded message functionalities, allowing only manual outbound calls initiated by human users.

This plan outlines J14 Marketing's measures to comply with FCC requirements under 47 CFR § 64.6305(a) and highlights our system's inherent restrictions, which actively prevent the origination of illegal robocalls.

2. System Safeguards to Prevent Illegal Robocalls

J14 Marketing's platform is configured to eliminate the possibility of originating illegal robocalls through the following enforced measures:

1. Manual Dialing Only:

- All outbound calls must be manually initiated by human users.
- Autodialing, predictive dialing, and prerecorded message functionalities are permanently restricted and disabled from our customer's access.

2. Caller ID Integrity:

- Caller ID spoofing is prohibited by default through system-level controls.
- Only verified and authorized caller IDs are permitted and entered by J14 Marketing directly.

These safeguards ensure that illegal robocalls cannot originate through J14 Marketing's services, reducing the need for extensive monitoring of restricted activities.

3. Customer Vetting and Onboarding

To prevent misuse of our services, J14 Marketing conducts thorough vetting during the onboarding process.

A. Customer Information Collection

Before onboarding, we collect and verify the following details from all prospective customers:

- Legal business name and physical address.
- Federal tax identification number.
- Nature of the customer's business and intended use of our services.
- Identification and contact information for compliance officers.

B. Contractual Requirements

- Customers must acknowledge that our platform restricts autodialing, predictive dialing, and prerecorded messaging.
- Customers agree to use our services in compliance with U.S. laws and regulations, including those governing illegal robocalls.

C. Ongoing Customer Oversight

Even after onboarding, we continue to monitor general traffic patterns to ensure usage aligns with the customer's stated business purpose.

4. Proactive Monitoring and Analysis

While our system inherently prevents illegal robocalls, J14 Marketing employs the following measures to ensure ongoing compliance and detect any potential misuse:

1. Customer Activity Oversight:

- We review general traffic patterns to confirm that usage aligns with the customer's stated business purpose.
- Unusual traffic trends, such as unexpected spikes in call volumes or destination anomalies, are flagged for review.

2. Enforcement Actions:

- If any suspicious activity is identified, services are suspended pending investigation.
- Violations result in immediate account termination and notification to relevant authorities.

These monitoring efforts, while minimal due to our system's restrictions, demonstrate our continued commitment to ensuring compliance.

5. Know-Your-Upstream-Provider Program

J14 Marketing relies on **Inteliquent** as our upstream provider for call routing and compliance with STIR/SHAKEN implementation. To satisfy the FCC's "know-your-upstream-provider" requirement, we:

1. **Confirm Compliance:**

- Verify that Inteliquent is registered in the FCC's Robocall Mitigation Database.
- Ensure Inteliquent's ongoing compliance with STIR/SHAKEN and its own robust robocall mitigation measures.

2. **Maintain Communication:**

- Maintain open communication with Inteliquent to stay informed of updates or changes to their compliance practices.

6. Traceback Cooperation

J14 Marketing is fully committed to cooperating with traceback requests within **24 hours**, as required by the FCC. To support this commitment, we:

1. Maintain accurate and detailed call records for all traffic originating through our system.
2. Promptly respond to inquiries from the FCC, Industry Traceback Group (ITG), and law enforcement.
3. Implement corrective actions, such as blocking traffic or terminating accounts, when violations are identified.

7. Enforcement and Call Blocking

J14 Marketing enforces its policies through the following measures:

1. **Proactive Blocking:** Any suspicious or verified illegal traffic is blocked immediately.
2. **Account Termination:** Customers found in violation of our policies face immediate account termination.
3. **Post-Incident Reviews:** All incidents are reviewed to improve processes and prevent recurrence.

8. Compliance and Transparency

J14 Marketing ensures transparency and accountability through:

- Publishing this Robocall Mitigation Plan and making it available to our customers.
- Maintaining detailed records of customer activity reviews, traffic analysis, and traceback responses.
- Cooperating fully with the FCC, ITG, and law enforcement in all investigations.

9. Ongoing Commitment to Compliance

J14 Marketing is committed to ongoing compliance by:

1. Continuously reviewing and updating this Robocall Mitigation Plan to align with FCC requirements and industry best practices.
2. Relying on our platform's inherent restrictions to prevent illegal robocalls.
3. Supporting industry-wide efforts to combat illegal robocall activity through cooperation and proactive measures.

10. Contact Information

For questions regarding this Robocall Mitigation Plan, please contact:

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