

Robocal Mitigation Policy

V 1.0

I. Overview

Couch Software Inc. is committed to maintaining full compliance with FCC regulations and ensuring that our platform is not used for illegal or unwanted robocalling activities. We primarily serve verified business customers who have completed a thorough Know Your Customer (KYC) process, minimizing the risk of unlawful calling campaigns. This policy outlines the steps we take to prevent, detect, and address illegal robocalls.

II. Customer Onboarding and Verification

1. **KYC Process:** All new customers undergo a stringent KYC verification, requiring valid business information and identification. Only reputable, law-abiding clients receive access to our platform.
2. **Ongoing Compliance:** Customers must agree to and regularly reaffirm their compliance with our terms of service, which strictly prohibit illegal or deceptive calling practices.

III. General Prohibition Against Illegal Robocalling

1. **Clear Prohibition:** Our terms of service explicitly forbid the initiation of illegal, unsolicited robocalls, as well as any activity that violates applicable laws or FCC regulations.
2. **Consent Requirements:** Customers are required to obtain proper consent before placing calls. Our client base consists of verified businesses that generally secure the prior consent of call recipients.

IV. Call Traffic Monitoring and Detection

1. **Real-Time Monitoring:** We continuously monitor call volumes, call destinations, and calling patterns. Unusual spikes or repetitive call behavior trigger immediate investigation.
2. **Data Analysis:** Advanced analytics help us identify suspicious calling patterns that may indicate illegal robocalling activity.

V. Collaboration with Upstream Providers

1. **Reputable Partners:** We work with well-established VoIP and SMS providers—such as Twilio—that maintain their own strict compliance frameworks.
2. **Shared Intelligence:** We communicate regularly with our upstream partners, sharing information and responding swiftly to any indicators of suspicious or noncompliant behavior.

VI. Enforcement Actions and Remedies

1. **Investigation Process:** Upon receiving complaints or detecting suspicious traffic, we conduct thorough investigations into affected accounts.
2. **Mitigation Measures:** If we confirm noncompliance, we immediately restrict or terminate the offending account and, when necessary, report the matter to the appropriate authorities.
3. **Continuous Improvement:** We periodically review and update our policies, procedures, and technologies to enhance our robocall mitigation capabilities.

VII. Reporting and Record-Keeping

1. **Documentation:** We maintain comprehensive records of customer onboarding, monitoring activities, investigations, and enforcement actions.
2. **Regulatory Reporting:** We comply with all FCC reporting requirements and remain prepared to provide relevant information to regulatory bodies upon request.

VIII. Conclusion

Couch Software Inc. is dedicated to promoting a secure, lawful communications environment. Through robust onboarding processes, stringent compliance measures, proactive monitoring, and swift enforcement actions, we maintain a high standard of integrity and compliance within our platform.

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