

LeadsPedia Robocall Mitigation Plan

Introduction

LeadsPedia's ("LP") is a call tracking and lead routing platform that allows businesses to manage, route, and report on inbound calls and leads within affiliate and performance marketing networks. LP does not dial calls, generate call traffic, or originate outbound calls on behalf of customers. LP functions solely as a routing and analytics platform for consumer-initiated calls. Inbound calls placed by consumers are processed and forwarded to subsequent outbound call legs, routing these calls exclusively to customer designated, pre-verified call centers or business customer destinations.

LP has adopted a robocall mitigation program and fully implemented the STIR/SHAKEN framework across its network to ensure compliance with FCC obligations.¹ This includes obtaining an SPC token and a STIR/SHAKEN certificate to sign calls through its platform.

Robocall Mitigation Strategy

LP has implemented a robocall mitigation plan to drive compliance within its platform and prevent the fraudulent transmission of consumer-originated calls to pre-verified call centers and business. It proactively monitors call traffic for patterns indicative of illegal robocall activities. In the unlikely event that such an activity occurs, LP would preemptively investigate, identify, and take reasonable steps to block or terminate the identified call traffic. LP does not utilize third-party analytics providers.

LP employs a comprehensive customer onboarding review process to ensure effective and appropriate Know Your Customer outcomes. This process includes verification of corporate registration, collection and authentication of customer contact information (business address and phone number, industry and website), evaluation of customer business operations and call practices, and assessment of upstream providers' compliance policies and procedures. LP also monitors through its platform for indicators of illegal robocalling, including abnormal call volumes, repeated attempts from the same source, or excessive call retries. If such patterns are detected, LP would promptly investigate and takes necessary action.

Prior to onboarding, customers must agree to contractual obligations to comply with all laws and regulation, including LP's Terms and Conditions, which are publicly available on its website, leadspedia.com. It also prohibits use the services for illegal purposes or to otherwise engage in fraudulent activity. Any customer found to have engaged in such behavior is subject appropriate action up to and including termination of services.

Know your Upstream Provider

LP has established policies and procedures to ensure it can identify the upstream providers

¹ See 47 C.F.R. § 64.6302(e) (requiring non-gateway intermediate providers to authenticate "all calls it receives directly from an originating provider and for which the caller identification information has not been authenticated and which it will exchange with another provider as a SIP call"); In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97, FCC 23-18, ¶ 17 (2023) (explaining that "the first intermediate provider in the path of an unauthenticated SIP call will now be subject to a mandatory requirement to authenticate the call").

from whom LP receives voice traffic. For instance, LP maintains an up-to-date list of its suppliers, including both business and technical contacts. LP also works with a limited number of suppliers and confirms that each one is listed in the FCC's Robocall Mitigation Database. In addition, LP is able to verify whether the traffic it receives has been authenticated by its upstream network providers.

Response to Traceback and Legal Requests

If LP receives an industry traceback request or other legal request, LP is committed to providing a timely response and efficient cooperation. LP's policy requires that all traceback requests from the FCC, FTC, the Industry Traceback Group, and other law enforcement agencies be addressed within 24 hours, or within any longer time frame specified by the requester, ensuring that any potential issues are swiftly investigated and resolved.

Plan Updates

As regulations, technology, and industry best practices evolve, LP will monitor such and revise its internal processes to ensure the plan adapts to ever-changing robocall strategies. It will update this plan and submit it through the Commission Registration System within 10 business days of any changes to its filing.