

Robocall Mitigation Program Description

Company Name: GF Leads

RMD Number: RMD0015234

Date: 02/13/2025

1. Overview

In compliance with **47 CFR § 64.6305(d)-(f)** and the guidelines outlined in **DA 24-73**, GF Leads has developed and implemented a Robocall Mitigation Program designed to prevent, detect, and mitigate unlawful robocalls originating from our network. This document outlines our commitment to ensuring compliance with FCC regulations, protecting consumers from unwanted and fraudulent calls, and maintaining the integrity of the telecommunications network.

2. Compliance Measures

2.1. Call Authentication Framework

- GF Leads has implemented the **STIR/SHAKEN** framework for IP-based voice traffic to verify caller identities and reduce the risk of caller ID spoofing.
- Calls originating from networks or endpoints that cannot support STIR/SHAKEN are subject to additional scrutiny under our mitigation policies.

2.2. Robocall Traffic Monitoring & Prevention

- We actively monitor our voice traffic for patterns indicative of illegal robocalling, including:
 - High call volumes with short durations
 - Repeated calls to the same numbers within a short timeframe
 - Calls flagged by analytics as potential robocalls
- Our real-time analytics and call-blocking mechanisms flag suspicious call traffic for review.

2.3. Caller Identification & Verification

- GF Leads enforces strict **Know Your Customer (KYC)** procedures, requiring verification of new customers before enabling outbound call services.
- Customers with a history of high-risk call traffic undergo additional verification and must provide documentation proving compliance with robocall mitigation requirements.

2.4. Complaint & Enforcement Handling

- We maintain an internal process for handling complaints related to robocalls, including:
 - Investigating and addressing reported robocall incidents within 48 hours.
 - Taking corrective actions such as warning, suspending, or terminating non-compliant accounts.
 - Cooperating with law enforcement and the FCC on identified robocall violations.

2.5. Gateway & Intermediate Provider Compliance (if applicable)

- If operating as a **gateway provider**, GF Leads implements enhanced screening of inbound

international traffic, ensuring that foreign-originated calls comply with FCC requirements.

- If acting as a **non-gateway intermediate provider**, we validate caller authentication information before forwarding calls to downstream carriers.

3. Implementation & Compliance Reporting

- GF Leads has designated a **Compliance Officer** responsible for overseeing our robocall mitigation efforts.
- We submit **quarterly compliance reports** to the FCC detailing:
 - Effectiveness of our robocall detection measures.
 - Actions taken against non-compliant customers.
 - Any updates or enhancements to our mitigation policies.

4. Certification Statement

I, **[Authorized Representative Name]**, as an authorized representative of GF Leads, certify that our company:

- Has implemented the measures outlined in this document.
- Will comply with all requirements of **47 CFR § 64.6305(d)-(f)**.
- Will submit this Robocall Mitigation Program Description to the FCC Robocall Mitigation Database.

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