

Robocall Mitigation Plan- my Leads Dialer LLC

This document serves as the Robocall Mitigation Program for My Leads Dialer LLC, in compliance with Section 4(b)(5)(C) of the TRACED Act and 47 C.F.R. §64.6305. This program ensures our commitment to mitigating illegal robocalls and compliance with FCC regulations.

Exemption from STIR/SHAKEN

My Leads Dialer LLC qualifies for the **Small Voice Service Provider** exemption under 47 C.F.R. §64.6304(a)(2). We serve fewer than 100,000 voice service subscriber lines and currently do not operate or control the necessary network infrastructure for implementing STIR/SHAKEN. Despite this exemption, we remain committed to ensuring that our services are not used to originate illegal robocalls.

Know Your Customer (KYC) Process

My Leads Dialer LLC implements a strict "Know Your Customer" (KYC) process designed to prevent the origination of illegal robocalls by our customers. This includes:

- **Customer Scrutiny:** We carefully evaluate all new and existing customers, especially those requesting high-volume voice origination services. This scrutiny includes verification of business credentials and ensuring the legitimacy of their use cases for our services.
- **Ongoing Monitoring:** My Leads Dialer LLC actively monitors customer behavior throughout the duration of their service. If any customer shows a pattern of suspicious activity or illegal robocalling, we take immediate action, such as:
 - Modifying service terms and conditions
 - Implementing enhanced monitoring
 - Suspension or termination of services
- **Compliance Commitment:** All customers must agree to our strict anti-robocalling policies as part of their service agreement. Non-compliance results in service suspension or permanent termination.

Know Your Upstream Provider

My Leads Dialer LLC also follows stringent procedures for vetting our upstream providers, ensuring that their traffic does not contribute to illegal robocalling activity:

- **Due Diligence:** Prior to onboarding any upstream provider, we perform a comprehensive assessment of their business, collecting vital demographic data and verifying their compliance with FCC guidelines.

- **Ongoing Review:** Should an upstream provider demonstrate questionable behavior (e.g., originating traffic that could be linked to illegal robocalls), we immediately investigate and request corrective action. Providers failing to address such issues are subject to service suspension or termination.
- **Partnerships:** We work with upstream carriers who have fully deployed the STIR/SHAKEN framework, leveraging their capabilities to better detect and mitigate robocalls.

Robocall Detection and Mitigation

My Leads Dialer LLC is dedicated to analyzing and mitigating illegal robocalls through collaboration with our upstream carriers and constant traffic monitoring:

- **Traffic Analysis:** By working with upstream providers that use STIR/SHAKEN, we continuously monitor voice traffic to identify suspicious patterns consistent with illegal robocalling.
- **Pattern Identification:** If a high volume of calls or specific calling patterns are detected that suggest illegal robocalling (e.g., repeated short-duration calls, high failure rates), we:
 - Identify the source of the calls
 - Verify that the party using our services is authorized to use the associated Caller ID number
 - Investigate the nature of the traffic
- **Corrective Measures:** If a customer is identified as originating illegal robocalls, appropriate actions are taken, including:
 - Traceback investigation with the FCC or law enforcement
 - Immediate suspension of services
 - Permanent termination if the activity persists

Response to Traceback Requests

My Leads Dialer LLC is committed to cooperating fully with traceback requests to stop illegal robocalling:

- **Timely Response:** We will respond to any traceback request within 24 hours of receiving it from the FCC, law enforcement, or the industry traceback consortium.
- **Cooperation:** My Leads Dialer LLC will assist in tracing and stopping any illegal robocallers using our services by providing the necessary information and taking prompt action to suspend or terminate service if warranted.
- **Data Integrity:** All voice traffic originating from our network is subject to this robocall mitigation program.

Contact Information for Traceback Requests

- **Name:** AHSAN IQBAL
- **Title:** Director
- **Phone Number:** +1(279) 977-5252
- **Email Address:** myLeadsDialer@gmail.com

Certification

I, AHSAN IQBAL, certify under penalty of perjury the following:

1. My Leads Dialer LLC qualifies as a Small Voice Service Provider under 47 C.F.R. §64.6304(a)(2), serving fewer than 100,000 voice service subscriber lines and currently lacks the infrastructure for STIR/SHAKEN implementation.
2. My Leads Dialer LLC operates solely under this business name and has not used any other business names previously.
3. None of the owners or principals of My Leads Dialer LLC have had FCC licenses denied, revoked, or been subject to an FCC enforcement proceeding.
4. The contact person responsible for addressing any robocall-related issues is [Contact Person's Name] whose details are provided below.
5. My Leads Dialer LLC's role in the call chain is that of a voice service provider, exempt from the requirement to implement STIR/SHAKEN.
6. My Leads Dialer LLC has not been prohibited from registering in the Robocall Mitigation Database due to an enforcement action.
7. My Leads Dialer LLC is not currently under investigation by the FCC, law enforcement, or any other regulatory body for unlawful robocalling or spoofing activities.

AHSAN IQBAL

Director

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