

Eugene Perkins Group, LLP – Robocall Mitigation and Compliance Plan (2025)

1. Purpose

This policy defines the procedures and standards Eugene Perkins Group, LLP uses to ensure that all customers utilizing its telecom and marketing infrastructure operate in compliance with applicable federal and state regulations, including the FCC, TCPA, USAC, STIR/SHAKEN, and the Telemarketing Sales Rule (TSR). This document also serves as the company's Robocall Mitigation and Compliance Plan for purposes of the FCC Robocall Mitigation Database and related regulatory filings.

2. STIR/SHAKEN Implementation Status

Eugene Perkins Group, LLP has fully implemented STIR/SHAKEN across all IP-based voice traffic in compliance with 47 CFR § 64.6301(a). All calls originating on our IP network are authenticated and verified using STIR/SHAKEN protocols. Non-IP segments are subject to mitigation measures described herein.

3. Traceback Participation Procedure

Eugene Perkins Group, LLP participates in Industry Traceback Group processes and cooperates fully with traceback requests. Upon receiving a traceback request, the company will acknowledge receipt within 24 hours, provide accurate call path and customer-of-record information, maintain call logs, cooperate with upstream/downstream carriers, and coordinate with compliance and legal staff for timely regulatory response.

4. Customer Vetting & Onboarding

The company verifies legal entity name, EIN, state registration, intended service scope, compliance attestation (TCPA, DNC), identity validation, and requires annual compliance acknowledgment.

5. Contractual Safeguards

All contracts prohibit illegal robocalling, spoofing, or masking; require DNC scrubbing; mandate written consent for automated/prerecorded calls; and include indemnification provisions protecting Eugene Perkins Group, LLP.

6. Technical Controls & Monitoring

Outbound calls must originate from properly attested Caller IDs. Traffic is monitored for short-duration ratios, volume spikes, and suspicious patterns. Registered DIDs are required. Opt-out compliance is enforced. Real-time analytics and filtering tools are deployed.

7. Regulatory Filings & Documentation

Maintain FCC Form 499-A (annual) and 499-Q (quarterly), USAC documentation, OCN/CIC records where applicable, and retain call detail records, consent logs, and attestation data for at least 24 months. Update Robocall Mitigation Database entries upon material change.

8. Customer Training & Education

Provide compliance packets including TCPA & TSR summaries, DNC procedures, consent recordkeeping examples, and STIR/SHAKEN guidance. Conduct periodic compliance updates and require designated compliance contacts.

9. Traffic Monitoring and Control

Continuous monitoring of outbound traffic for anomalous spikes, irregular patterns, and non-consented outreach. Customers exhibiting suspicious traffic may be subject to review, mitigation, suspension, or termination.

10. Recordkeeping and Documentation

Maintain call detail records, consent logs, and attestation data for a minimum of 24 months. Reports reviewed quarterly and updated annually.

11. Enforcement & Termination

Violations may result in immediate suspension or permanent termination and regulatory notification if required by law. Investigations include written findings and recommendations.

12. Internal Oversight

The Compliance Officer conducts quarterly audits. Annual reviews evaluate effectiveness of vetting, monitoring, and documentation processes. Updates require Managing Director approval.

13. Contact Information

Authorized by: Vincent W. Kahn, Managing Director, Eugene Perkins Group, LLP Effective Date:
November 1, 2025 Review Cycle: Annual