

Robocall Mitigation Program Description for Aibillity LLC (Operating Calleek Service)

1. Overview of Aibillity LLC's Calleek Service

Aibillity LLC is planning to offer the Calleek platform, which provides outbound-only calling capabilities to international numbers, including destinations in the United States and Canada. The Calleek service enables customer-initiated calls via a mobile app, with outbound call termination provided by wholesale entities.

2. STIR/SHAKEN Implementation Status

The Calleek service utilizes wholesale entities for outbound call termination. As these providers are carriers with their own STIR/SHAKEN obligations, Aibillity LLC does not directly implement STIR/SHAKEN within the Calleek infrastructure. However, Aibillity LLC ensures that all call traffic from Calleek is authenticated and verified before being routed to these providers. All call originations from Calleek comply with industry standards and use authenticated endpoints to mitigate the risk of robocalls.

3. Customer Authentication and Verification Procedures

Aibillity LLC employs a robust customer authentication and verification process for its Calleek service to ensure only legitimate users can place calls. These measures include:

- **Twilio API for Phone Number and Customer Verification:**
Calleek verifies customer identities during registration and login using SMS and email-based one-time password (OTP) authentication via Twilio APIs. Only verified users can access the platform.
- **Secure Authentication for Servers:**
Authentication mechanisms are implemented for servers running the services powering Calleek to ensure only authorized users can initiate calls through the system. Unauthorized access is strictly prohibited and monitored.

4. Call Monitoring and Pattern Analysis

The Calleek service actively monitors call traffic patterns to detect and prevent suspicious activity. Measures include:

- **Usage Analytics:**
Monitoring the frequency, duration, and destinations of calls to identify unusual or potentially fraudulent calling behavior.
- **Threshold Alerts:**
Setting thresholds for call volumes and rates to detect possible misuse. Any anomalies trigger automated alerts for manual review.

5. Commitment to Responding to Traceback Requests

Aibillity LLC, operating the Calleek service, is committed to fully cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium to investigate and address illegal robocall traffic. Specifically:

- Calleek will make reasonable efforts to respond to traceback requests within 24 hours.
- Calleek will provide detailed records and logs to assist in identifying the source of any unauthorized or illegal calls.

6. Customer Usage Policy and Monitoring

The Calleek service enforces a strict customer usage policy, prohibiting the use of its platform for fraudulent, illegal, or unauthorized purposes. Violations of this policy may result in:

- Immediate suspension or termination of the user account.
- Reporting to relevant regulatory authorities as necessary.

7. Robocall Mitigation Practices

To further mitigate the risk of originating illegal robocalls:

- Calleek ensures that all outbound calls include proper caller identification in +E164 format, consistent with the requirements outlined by wholesale providers.
- Only valid and callable numbers are allowed as originating caller IDs.

8. Compliance with Regulatory Requirements

Aibillity LLC complies with all applicable FCC regulations regarding robocall mitigation. For calls to the US and Canada, Aibillity LLC has registered the Calleek service with the Robocall Mitigation Database and adheres to the necessary reporting and mitigation standards.

9. Contact Information for Robocall Mitigation Inquiries

For inquiries or assistance regarding the Robocall Mitigation Program for Aibillity LLC's Calleek service, please contact:

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