

Gold Leaf Telecom Ltd. Robocall Mitigation Plan

1. Company Information

- a. Company Name: Gold Leaf Telecom Ltd.
- b. Physical Address: 338-550 York Regional Rd 7, Richmond Hill, ON L4B 3Z4, Canada
- c. Primary Contact:
- d. Role: Voice Service Provider

2. Overview of Services

Gold Leaf Telecom Ltd. is a Canadian-based voice service provider offering VoIP services primarily to residential and business customers in Canada. We route a limited number of calls (less than 500 monthly) to the United States.

3. Customer Vetting and Onboarding

- a. We implement a rigorous “Know Your Customer” (KYC) process:
 - i. Manual sign-up process for all clients
 - ii. No automated web-based registration
 - iii. Personal interaction with each potential customer
 - iv. Strict policy against onboarding call centers
 - v. Focus on Canadian-based residential and business clients only

4. Traffic Management and Monitoring

- a. To prevent and mitigate illegal robocalls, we employ several strategies:
 - i. Call Volume Limitations:
 - 1. Customers are restricted by the number of concurrent calls they can make
 - 2. Pricing model based on call paths, discouraging high-volume calling
 - ii. SIP Traffic Logging:
 - 1. Comprehensive logging of all SIP traffic for monitoring and analysis
 - iii. DID Restrictions:
 - 1. Strict control over which DIDs are allowed to pass through our system
 - iv. IP-based Access Control:
 - 1. Current implementation of IP-based restrictions for clients with static IP addresses
 - 2. Ongoing development of a system to extend this control to clients with dynamic IPs

5. Traceback Process

- a. We are committed to responding promptly to traceback requests:
 - i. Response time within 24 hours for all traceback requests
 - ii. Willingness to adopt recommended traceback processes as they become available

6. Contractual Measures

- a. Our terms of service include clauses prohibiting unlawful use of our services:

- i. Explicit prohibition of using services for illegal, harmful, threatening, abusive, harassing, defamatory, obscene, sexually explicit, profane, or racially/ethnically disparaging purposes
 - ii. Right to terminate service immediately and without notice for violations of these terms
- 7. Employee Training
 - a. Despite our small team size, all employees are trained on:
 - i. Identifying potential illegal robocall activity
 - ii. Implementing and maintaining our robocall mitigation measures
 - iii. Responding to and mitigating all forms of illegal activity on our network
- 8. Compliance and Updates
 - a. To ensure ongoing compliance with U.S. regulations:
 - i. We will actively monitor for updates from the FCC and RMD
 - ii. Our robocall mitigation practices will be reviewed and updated promptly upon receiving notifications of regulatory changes
- 9. Commitment to Mitigation
 - a. Gold Leaf Telecom Ltd. is committed to:
 - i. Continuously improving our robocall mitigation effort
 - ii. ~~Co~~operating fully with U.S. authorities in combating illegal robocalls
 - iii. Maintaining a secure and trustworthy telecommunications environment for our customers and those they call
- 10. Certifications and Commitments

Gold Leaf Telecom Ltd. hereby certifies that:

 - a. All calls originated on our network are subject to this robocall mitigation program, which includes reasonable steps to avoid originating illegal robocall traffic.
 - b. We commit to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.
 - c. We will cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use our service to originate calls.
 - d. Any prior certification has not been removed by Commission action.
 - e. We have not been prohibited from filing in the Robocall Mitigation Database by the Commission.
 - f. We have not implemented the STIR/SHAKEN authentication framework on any portion of our network.

Thank you for your consideration,

Oleg Kalyadin
Gold Leaf Telecom Ltd.