

Robocall Mitigation Program

Company Name: Gaglers Inc dba CallHub

FCC Registration Number (FRN): 0036499440

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1. Introduction

CallHub is a cloud-based communications platform that provides outbound calling services for its clients. We do not directly connect to the Public Switched Telephone Network (PSTN) or hold our own telephone numbering resources. Instead, we pass calls to upstream carriers, which have direct PSTN interconnections and implement STIR/SHAKEN as required.

As required by **47 CFR § 64.6305**, this Robocall Mitigation Program describes our policies and procedures to prevent and mitigate illegal robocall traffic traversing our platform.

2. Role in the Call Chain

1. Clients (End Users):

- Various businesses, nonprofits, and organizations use our platform to initiate outbound calls (e.g., marketing or informational campaigns).

2. CallHub Platform:

- Our system receives the outbound call requests and manages campaign logistics (scheduling, call scripts, etc.).
- We then pass these requests to one or more upstream carriers.

3. Upstream Carriers:

- They hold numbering resources and maintain PSTN interconnections.
- They originate calls onto the PSTN and handle STIR/SHAKEN authentication.

4. Call Recipients:

- The final called parties receive these calls through their terminating service providers.

Because we rely on upstream carriers, CallHub itself does not implement STIR/SHAKEN but does maintain a Robocall Mitigation Program to ensure we do not knowingly enable illegal robocalling.

3. Mitigation Measures

3.1 Customer Vetting and Acceptable Use Policy

- **Account Registration:**
All new users must provide valid account details (e.g., legal name, email, business information) and agree to our Terms of Service (TOS) and Acceptable Use Policy (AUP).
- **Explicit Prohibition of Illegal Robocalling:**
Our TOS/AUP explicitly prohibits robocalls that violate federal or state laws, including spam, scam, and fraudulent activity.

3.2 Traffic Monitoring

- **Call Volume & Pattern Checks:**
We monitor daily call volumes and call patterns and contents for anomalies (e.g., phishing attempts, exceptionally high call rates or short-duration etc).
- **Alerts & Reviews:**
If our monitoring tools detect suspicious trends, we review the affected account(s) to determine if calls appear fraudulent or violate our policies.

3.3 Suspension or Termination for Abuse

- **Immediate Action:**
If we confirm or strongly suspect illegal robocalling, we will suspend or terminate the offending account to prevent further unlawful activity.
- **Investigation & Documentation:**
We may require users to provide documentation (e.g., call scripts, consent records) if suspicious activity is detected. Failure to provide such documentation or resolve the concerns may result in permanent account closure.

3.4 Traceback Cooperation

- **Call Detail Records (CDRs):**
We retain CDRs for a reasonable period (e.g., at least 12 months) to facilitate traceback investigations.
- **Rapid Response:**
We respond to traceback requests from law enforcement, the FCC, or the industry traceback consortium as promptly as possible, typically within 24 hours.
- **Collaboration:**
We share necessary information with authorized entities to help identify and halt illegal robocallers.

3.5 STIR/SHAKEN Implementation Status

- **No Direct STIR/SHAKEN:**

We do not apply STIR/SHAKEN ourselves, as we do not originate calls onto the PSTN. Our upstream carriers are responsible for STIR/SHAKEN call authentication.

- **Future Updates:**

If CallHub obtains PSTN interconnection or numbering resources in the future, we will update this Program to include direct STIR/SHAKEN compliance.

4. Certification and Conclusion

CallHub certifies that:

1. We have established and enforce the above measures to **prevent and mitigate** the origination of illegal robocall traffic on our platform.
2. We will **respond promptly** (within 24 hours, whenever feasible) to traceback requests from law enforcement, the FCC, or industry traceback entities.
3. We prohibit users from engaging in **illegal robocalling** per our Terms of Service and Acceptable Use Policy.
4. We comply with **47 CFR § 64.6305** by taking **reasonable steps** to avoid facilitating unlawful robocall campaigns.

Disclaimer

This document does not constitute legal advice. It is intended to outline CallHub's internal policies and procedures for robocall mitigation. CallHub reserves the right to update or modify this program at any time to ensure continued compliance with FCC rules and industry best practices.
