

Introduction

As a provider in the national telephone ecosystem, Needl Inc. dba Aurelian (“Aurelian”) is committed to maintaining the integrity of the national phone network and safeguarding consumers from fraudulent or unauthorized calls. This document outlines technical and operational measures Needl Inc. uses to detect and mitigate unlawful robocall activity on its network.

By submitting this RMP with the FCC, Aurelian certifies that:

- All calls originating, transiting or termination on Aurelian’s network are subject to this RMP and comply with these mitigation measures
- Aurelian’s maintains its certification status with regulatory authorities and prior certification has not been revoked by the FCC
- Needl Inc has not been prohibited from filing in the Robocall Mitigation Database by the FCC
- Over the past two years, neither Aurelian, nor any associated entities have been the subject of a formal FCC, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient RMD certification or mitigation program description.

This RMP, reflects the “reasonable steps to mitigate illegal robocall traffic” and “a commitment to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.”

Mitigation Measures

1. Know Your Customer (KYC)

Aurelian primarily contracts with public safety agencies as its customers. For each customer agency that uses Aurelian’s services, Aurelian verifies the agency’s identity through several measures.

- Aurelian verifies the legitimacy and authority of the public safety agency via publicly available information

- Aurelian verifies the signer of the contract's connection to the public safety agency and confirms their legal authority to sign contracts on behalf of the agency
- Aurelian has assigned an account person to every customer agency

2. Platform Restrictions

Aurelian does not allow customer agencies to initiate outbound calls through its platform. Aurelian customers may only place outbound calls in order to transfer an inbound call to another number. In this case, Aurelian limits the outbound caller ID to either A) the inbound call caller ID or B) a phone number that the customer has purchased through Aurelian.

3. Network Security

Aurelian takes several measures to enhance its network posture and limit potential attack surfaces, including limiting access to its platform to trusted customer IP addresses, deploying a web application firewall to block traffic from suspicious ranges, and rate limiting traffic to its service.

4. Analytics and Monitoring

Aurelian implements code scanning, and network monitoring tools, to proactively address security vulnerabilities and monitor for unauthorized traffic within its network.

5. Incident Management & Response

Aurelian collaborates with industry partners such as the USTA Industry Traceback Group (ITG) and telecommunications providers to investigate and respond to reports of unauthorized call activity. Reports submitted via automated systems, external analytics, or customer feedback are reviewed within 24 hours. Additionally, contracts with users and partners include acceptable use policies subject to enforcement through monitoring and manual review.

6. Training

Aurelian implements a structured training program for all employees. Employees receive instruction on prerequisites for onboarding new customers and renewals to adhere to the RMP. Employees are also instructed on how to address illegal robocall concerns, traceback requests, and regulatory requirements.

Corporate Information

Legal Entity:

Needl Inc.

Executive Leadership:

Max Keenan, CEO

James Liu, CTO

Affiliates:

None

Compliance Contact

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