

Robocall Mitigation Program Description

Company Overview and Service Description: Our company operates exclusively as a call-tracking provider. We do not originate outbound calling campaigns independently; instead, we provide a service wherein inbound calls placed by legitimate consumers trigger subsequent outbound call legs, routing these calls exclusively to designated, pre-verified call centers or business customer destinations.

Reason for STIR/SHAKEN Exemption: We qualify for exemption from implementing STIR/SHAKEN under 47 CFR § 64.6304(a)(1). Our service acts solely as an intermediate non-originating provider, facilitating calls initially originated externally. Therefore, the STIR/SHAKEN authentication framework does not apply directly to our specific business model, given that we neither assign phone numbers to end-users nor directly authenticate call origination.

Robocall Mitigation Program Elements: In compliance with 47 CFR § 64.6305(c), our comprehensive robocall mitigation program includes:

1 Reasonable Prevention Steps:

- Active monitoring of call traffic for patterns indicative of illegal robocall activities.
- Immediate blocking or termination of identified illegal traffic or abusive call patterns.

2 Traceback Commitment:

- Full cooperation and timely response (within 24 hours) to all traceback requests from the FCC, law enforcement agencies, and the industry traceback consortium.

3 Investigation and Enforcement Cooperation:

- Cooperation with authorities and industry stakeholders to investigate, identify, and discontinue the services used by any illegal robocallers or entities misusing our call-tracking and routing services.

Certification of Compliance: We affirm that no prior certification has been removed by FCC action, and the FCC has not prohibited our filing in the Robocall Mitigation Database.