

1. Company Information

- **Legal Name:** GCS
 - **FCC Registration Number (FRN):** 0036963411
 - **Contact Name:** Rashad Deniro Price
 - **Title:** Director
 - **Email:** rashad@gcsusllc.com
 - **Phone:** 817-203-2643
 - **Address:** 9802 Caballero Dr, Houston, TX 77078
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2. Service Description

GCS is a registered VoIP service provider offering outbound and inbound voice services to commercial clients across the United States.

Our call origination does not occur over SIP-based IP interconnection. Instead, our services rely on upstream providers for SIP signaling and routing.

As a result, GCS does not currently have the technical capability to implement STIR/SHAKEN directly. Nevertheless, GCS has established and maintains a comprehensive robocall mitigation program in accordance with FCC guidelines.

3. Robocall Mitigation Practices

A. Know Your Customer (KYC)

- All clients are required to complete a formal onboarding process.
- We verify customer identity, gather official business documents, and assess intended use cases.
- A signed service agreement is mandatory for all clients.

B. Call Traffic Monitoring

- Automated and manual monitoring tools are used to analyze outbound traffic behavior.
- We flag unusual patterns (e.g., excessive short-duration calls, spikes in volume, unassigned numbers).
- Flagged accounts are manually reviewed by our compliance team.

C. Call Blocking and Blacklisting

- We block known bad numbers, invalid caller ID formats, and Do-Not-Originate (DNO) numbers.

- Blocklists are updated regularly based on industry data and traceback feedback.

D. Complaint Handling

- GCS provides a dedicated email and phone line for complaints related to call abuse.
- All complaints are documented and investigated within 24 hours.
- Offending accounts are suspended or terminated based on investigation results.

E. STIR/SHAKEN Participation

- GCS does not implement STIR/SHAKEN on any portion of its network due to technical limitations.
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4. Compliance Contact

- **Name:** Rashad Deniro Price
 - **Title:** Director
 - **Email:** rashad@gcsusllc.com
 - **Phone:** 817-203-2643
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5. Principals, Affiliates, Subsidiaries, and Parent Companies

GCS is a privately held entity.

- **Principal:** Rashad Deniro Price
- **Title:** Director
- **Ownership:** 100%

There are no parent companies, subsidiaries, or affiliated companies associated with GCS.

6. STIR/SHAKEN Exemption Justification

GCS has not implemented the STIR/SHAKEN authentication framework on any portion of its network.

This is because our network currently lacks SIP-based interconnection capabilities, which are required for STIR/SHAKEN implementation.

GCS qualifies for an exemption under **47 CFR § 64.6304(d)** because:

- Our network cannot natively support STIR/SHAKEN;
- We rely entirely on upstream carriers for SIP signaling and routing.

Despite this exemption, GCS remains committed to full compliance with **47 CFR § 64.6305(a)** by:

- Taking reasonable steps to prevent the origination of illegal robocall traffic;
- Maintaining a strict robocall mitigation program as outlined in this plan;
- Responding fully and within 24 hours to any traceback requests;
- Cooperating fully with the FCC, law enforcement, and the Industry Traceback Group (ITG) in any investigations.

Signed,
Rashad Deniro Price
Director
GCS
 April 25, 2025