



Robocall Mitigation Policy

Purpose and Scope

This Robocall Mitigation Policy outlines the measures implemented by Rage Technologies, Inc. DBA Gazelle Telecommunications ("Gazelle") to prevent the origination of illegal robocalls on our network. This policy complies with the FCC's requirements under the TRACED Act and related regulations.

Know Your Customer (KYC) Procedures

Gazelle implements rigorous customer verification procedures including:

1. Collection and verification of customer identity through government-issued identification
2. Verification of physical business address and contact information
3. Review of customer's business type and intended use of voice services
4. Assessment of customer's calling patterns and volume
5. Regular review and updates of customer information

STIR/SHAKEN Implementation

Gazelle has fully implemented STIR/SHAKEN call authentication framework across our IP network to:

- Authenticate and verify caller ID information
- Assign appropriate attestation levels to calls
- Sign calls originated on our network
- Verify signatures on calls received from other providers

Traffic Monitoring and Analytics

We employ advanced traffic monitoring systems to:

- Track calling patterns and identify suspicious activity
- Monitor call duration, answer rates, and other metrics
- Identify spikes in call volume or unusual behavior
- Generate automated alerts for potential robocall activity
- Maintain detailed records of all originated traffic

Traceback Cooperation

Gazelle fully cooperates with:

- Industry Traceback Group investigations
- Law enforcement agencies
- FCC and other regulatory bodies
- Other carriers' traceback requests

We respond to traceback requests within 24 hours and maintain records of all traceback investigations.

Mitigation Measures

When suspicious or illegal robocall activity is detected, we:

1. Immediately investigate the source
2. Block suspicious traffic patterns
3. Suspend or terminate services for policy violators
4. Report confirmed illegal activity to relevant authorities
5. Document all mitigation actions taken

Customer Education and Compliance

We provide customers with:

- Clear terms of service prohibiting illegal robocalls
- Educational materials about compliance requirements
- Regular updates on policy changes and requirements
- Technical assistance for implementing call authentication
- Guidelines for legitimate automated calling practices

Complaint Handling

Gazelle maintains procedures for:

- Receiving and investigating robocall complaints
- Documenting complaint resolution steps
- Implementing corrective actions
- Reporting serious violations to authorities
- Following up with affected parties

Policy Updates and Review

This policy is reviewed and updated:

- At least annually
- When new regulations are introduced
- Following major industry developments
- After significant security incidents
- Based on effectiveness assessments

Contact Information

For questions about this policy or to report suspicious calling activity:

Email: support@gazelletel.com

Phone: (818) 493-7500

Address: 2017 Montrose Avenue, Montrose, California 91020

Certification

This Robocall Mitigation Policy is certified by:

Phillip Casalegno

Chief Executive Officer

Rage Technologies, Inc. DBA Gazelle Telecommunications

Date: 03/19/2024