



AFFINITYCLICK

Robocall Mitigation

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AffinityClick - Robocall Mitigation

Document Information

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Introduction

The Federal Communications Commission (FCC) requires that all “Voice Service Providers” provide a certification to the FCC’s Robocall Mitigation Database, providing detailed information regarding their implementation of the STIR/SHAKEN caller ID authentication framework and their related robocall mitigation program.

AffinityClick Corp., a subsidiary of AffinityClick Inc., (“AffinityClick”) is an enterprise that creates, maintains, and makes available for distribution voice over internet protocol (VoIP) software accessed via mobile application. AffinityClick applications are available for download from both the iOS and Android app stores. The applications provide a convenient and cost-effective solution for making and receiving VoIP calls via a mobile app.

As detailed below, consistent with the FCC’s rules, AffinityClick takes reasonable steps to avoid originating, carrying, and processing illegal robocall traffic, as detailed below. AffinityClick takes affirmative, effective measures to prevent new and renewing customers from using its network to originate illegal calls.

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Robocall Mitigation Plan

AffinityClick's applications, by design, do not lend themselves to robocalling implementations. AffinityClick's practices can be reasonably expected to significantly reduce the carrying, processing, or origination of illegal robocalls.

[Reasonable Steps to Avoid Carrying, Processing, or Origination of Illegal Robocalls](#)

AffinityClick does not make available any SDKs or APIs which allow for external implementations. Human interaction with the mobile application is the only supported use of the Voice Services that AffinityClick provides through its applications. This means that AffinityClick's application cannot be leveraged for a robocalling solution. All calls need to be initiated by a user of the app running on an Android or iOS device. Furthermore, account owners cannot hold more than one active call at a time, and all outbound calls are validated before they can be initiated. AffinityClick's call authentication regime involves protected usernames and passwords.

AffinityClick's traffic is subject to STIR/SHAKEN caller ID authentication.

["Know-Your-Customer" and "Know-Your-Upstream Provider" Procedures](#)

AffinityClick provides Voice services in partnership with a single reputable CLEC who initiates, carries, and terminates all calls on the AffinityClick applications. AffinityClick works with CLEC partners to obtain and manage phone numbers (DIDs) used by and available to the users of its app. All number ports are validated, requiring users to prove ownership through a variety of means, including, but not limited to, phone bills, and PIN codes.

AffinityClick takes affirmative, effective measures to prevent new and returning customers from originating illegal calls. AffinityClick's Terms of Service prohibit users from placing illegal calls. AffinityClick investigates all suspicious activities and AffinityClick has the right to terminate service if customers engage in illegal calls.

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[Call Analytics Systems Used to Identify and Block Robocall Traffic](#)

AffinityClick has implemented a proprietary machine learning platform which monitors inbound/outbound call ratios and which can identify suspicious calling patterns such as sequential dialing. User accounts exhibiting suspicious calling patterns are immediately flagged and automatic action can be taken to deactivate the account and thereby prevent their ability to make or receive Voice calls on the relevant AffinityClick application. AffinityClick does not use third-party analytics providers.

[Anti-Fraud Measures](#)

AffinityClick proactively applies anti-fraud measures. AffinityClick will deactivate accounts if any fraudulent or abusive activities are reported. Upon account deactivation, the user will no longer be able to make use of AffinityClick services provisioned to the account.

[Blacklisting and DNO](#)

AffinityClick can blacklist callee numbers which have elected to no longer receive calls from AffinityClick-owned phone numbers. Additionally, AffinityClick works in coordination with its CLEC partners to ensure that any traffic relating to any numbers on reasonable Do-Not-Originate lists will not be transmitted on AffinityClick applications.

[Call Blocking](#)

In keeping with the U.S. State Attorneys General Anti-Robocall Principles, AffinityClick provides mobile users with the ability to easily block calls from AffinityClick mobile applications. This feature is free-to-use, with easily understood instructions which are provided through the AffinityClick Support Centre.

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[Traceback Participation](#)

AffinityClick commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls requests..

[U.S. State Attorneys General Anti-Robocall Principles](#)

AffinityClick regularly reviews its robocall mitigation program as against the Anti-Robocall Principles enumerated by the U.S. Attorneys General. The procedures and measures set out above are consistent with these Anti-Robocall Principles.

[Parents, Subsidiaries, Affiliates, and Principals](#)

AffinityClick, Inc. (Parent)

Justin Shimoon, Co-Founder & CEO; Timo Mika Glaesser, Co-Founder & CTO

AffinityClick Corp. does not have any subsidiaries or affiliates.

[Robocall Mitigation Database Filing History](#)

AffinityClick certifies that it has not been prohibited from filing in the Robocall Mitigation Database at any time.

[Certification Regarding Robocall Investigations](#)

AffinityClick certifies that it is not subject to an FCC, law enforcement or regulatory investigation related to robocalling.