

Robocall Mitigation Program Description – Truepicks LLC

1. Company Information

Legal Name: Truepicks LLC

Business Type: Non-facilities-based voice service provider (using upstream carriers for call termination)

FCC FRN: [REDACTED]

RMD Record Type: Voice Service Provider Certification

Contact:

Name: [REDACTED]

Email: [REDACTED]

Phone: [REDACTED]

2. Summary of Mitigation Practices

Truepicks LLC provides peer-to-peer (P2P) calling and messaging services to U.S. and Canadian customers. We do **not** allow bulk robocalling, auto-dialer traffic, or application-to-person (A2P) messaging through our platform.

We have implemented the following robocall mitigation steps in compliance with 47 CFR § 64.6305(a):

- **Customer Identity Verification:**

- All new accounts require 2-factor authentication (2FA) and verified payment information before activation.
- Service activation is denied for accounts failing identity verification or matching known fraud indicators.

- **Traffic Monitoring:**

- Continuous monitoring of outbound call patterns to detect suspicious behaviors such as high-volume bursts, repetitive dialing, or abnormal call completion ratios.
- Automatic blocking of flagged numbers and suspension of accounts pending investigation.

- **Content Controls:**

- Review and restriction of any outbound calling that appears to deliver pre-recorded or autodialed messages.
- No group messaging, no contact list importing, and no high-volume broadcast features.

- **Geographic & Service Restrictions:**

- Service is limited to the United States and Canada.
- One number per account; blocked numbers are never reassigned.

3. Traceback Cooperation

Truepicks LLC responds to all traceback requests from the Commission, law enforcement, and the industry traceback consortium **within 24 hours**. We cooperate fully to identify and terminate any customer accounts determined to have originated illegal robocall traffic.

4. Enforcement Actions

If an account is confirmed to be involved in illegal robocalling:

- Immediate suspension and permanent termination of the account.
- Reporting of the offending customer to relevant authorities and upstream carriers.

5. STIR/SHAKEN Implementation

All SIP calls originated through Truepicks LLC's network are authenticated using STIR/SHAKEN via our upstream carrier partners, ensuring compliance with 47 CFR § 64.6301(a)(1) and (2).

6. Compliance Commitment

Truepicks LLC is committed to:

- Maintaining reasonable steps to avoid originating illegal robocall traffic.
- Responding fully and within 24 hours to all traceback requests.
- Cooperating with enforcement entities to investigate and stop illegal robocalling.
- Updating this Robocall Mitigation Program as necessary to reflect changes in technology and regulation.