

Lead4U LLC – Robocall Mitigation Program

I. Background

Lead4U LLC (“Lead4U”) files this Robocall Mitigation Plan in compliance with the Federal Communications Commission (“FCC”) requirements under 47 CFR § 64.6305. Lead4U certifies in the FCC’s Robocall Mitigation Database (RMD) that all calls originated, carried, or processed by the company are subject to a mitigation program consistent with Commission rules. Lead4U has implemented policies and controls to prevent the origination of unlawful robocalls, and commits to cooperating with regulators, law enforcement, and the industry traceback consortium in investigations.

II. STIR/SHAKEN Compliance

Lead4U LLC relies on its upstream carrier, BulkVS, which has fully implemented the STIR/SHAKEN authentication framework, to perform caller ID authentication on all outbound calls. Lead4U does not directly assign or maintain STIR/SHAKEN certificates. This filing is therefore submitted under Option 2: Partial STIR/SHAKEN Implementation.

III. Exemption Justification

Pursuant to 47 CFR § 64.6301(a)(4), Lead4U LLC is exempt from directly implementing STIR/SHAKEN because it does not operate as a facilities-based voice service provider with its own interconnection to the PSTN. All outbound calls are routed exclusively through BulkVS, which has fully deployed STIR/SHAKEN across its network. As such, BulkVS performs call authentication on behalf of Lead4U’s traffic. Lead4U enforces strict customer vetting, traffic monitoring, and traceback compliance as required by FCC rules.

IV. Know Your Customer (KYC) Standards

Lead4U undertakes commercially reasonable measures to validate customer identity and intended use of services before activating telecom accounts. Customers are required to provide proof of incorporation, valid contact information, and details of intended usage. Lead4U reserves the right to deny service to customers engaged in questionable practices or lacking compliance documentation.

V. Acceptable Use Policy

Customers must comply with Lead4U’s Acceptable Use Policy (AUP), which prohibits the use of services for illegal, abusive, fraudulent, or deceptive activities. This includes compliance with the Telephone Consumer Protection Act (TCPA), Telemarketing Sales Rule (TSR), Truth

in Caller ID Act, and all applicable FCC regulations. Violations may result in suspension or termination of services.

VI. Monitoring and Enforcement

Lead4U monitors customer traffic for abnormal patterns such as short call durations, excessive call attempts, and anomalous number usage. Traffic found to be indicative of unlawful robocalling or spoofing is subject to investigation, and offending accounts may be suspended or terminated.

VII. Traceback Cooperation

Lead4U commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. The company will dedicate resources to provide timely and complete responses to such requests.

VIII. Enforcement History

Lead4U LLC affirms that it has not been the subject of any FCC, law enforcement, or regulatory enforcement action related to illegal robocalls, spoofing, or deficient mitigation practices.

IX. Company Information

Entity Name: Lead4U LLC

Headquarters: Dallas, Texas