

Robocall Mitigation Program Description

1. Company Information

- **Company Name:** [Your Company Name] ("Job X")
- **Address:** [Your Company's Full Address]
- **FCC Registration Number (FRN):** [Your Company's FRN]
- **Date of Submission:** August 28, 2025

2. Program Overview and Commitment

This document outlines the Robocall Mitigation Program for [Your Company Name], a voice AI company operating as a foreign entity. Our program is designed to prevent the origination of illegal robocalls, in accordance with the requirements of the Federal Communications Commission (FCC) under 47 CFR § 64.6305(a).

[Your Company Name] is fully committed to cooperating with the FCC, law enforcement, and the industry traceback consortium. We pledge to respond fully and within 24 hours to all traceback requests and to assist in investigating and stopping any illegal robocallers that may attempt to use our service.

3. Description of Robocall Mitigation Practices

Our program is based on the core principles of proactive lead verification, strict adherence to consumer consent, and diligent partner vetting. The reasonable steps we take to avoid originating illegal robocall traffic are detailed below.

A. "Know Your Customer" and Partner Vetting

Our services are provided in partnership with a U.S.-based affiliate network. A foundational component of our mitigation program is a thorough "Know Your Customer" (KYC) process for this partner. We ensure that our affiliate partner has robust and compliant mechanisms for generating leads and obtaining explicit, prior consent from consumers. We do not conduct business with partners who cannot demonstrate compliant lead generation practices.

B. Inbound and Outbound Call Verification Protocol

Our Voice AI technology is central to our mitigation efforts and is used in the following ways:

- **Inbound Call Verification:** We process incoming calls for our U.S. affiliate partner to verify the authenticity and intent of leads. Our AI analyzes call patterns and responses to filter and flag suspicious traffic that may indicate fraudulent or non-consensual leads.
- **Strict "Opt-In" Outbound Calling:** All outbound calls made using our platform are directed exclusively to leads that have been verified as "opt-in." This means the consumer has provided prior express written consent to be contacted. Our system maintains records of this consent. We do not engage in cold calling or calls to lists where

consent cannot be verified.

C. AI-Powered Compliance Monitoring

We utilize our proprietary Voice AI to actively monitor call traffic for signs of abuse. This includes:

- Analyzing call duration, frequency, and connection rates to identify patterns indicative of illegal robocalling.
- Blocking and flagging any calling campaigns that deviate from established, compliant parameters.

D. Commitment to Traceback Cooperation

As stated in our program overview, [Your Company Name] is committed to full and timely cooperation with traceback requests. Our designated Robocall Mitigation Contact is authorized and equipped to handle these requests promptly.

4. Conclusion

[Your Company Name] takes its responsibility to prevent illegal robocalls seriously. Through diligent partner vetting, a strict adherence to verified opt-in leads, and the use of advanced AI for monitoring, we have implemented a robust program to ensure our services are used for legitimate and compliant business communications.