

Robocall Mitigation Program
Gemini Networking & Security LLC

1. Company Identity

Business Name: Gemini Networking & Security LLC

FRN: 0037518586

499 Filer ID: 838179

2. Robocall Mitigation Contact

Name/Title: Gemini Compliance Officer

Department: Regulatory Affairs

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3. Policy Against Illegal Robocalls

Gemini Networking & Security LLC prohibits the origination, transmission, or routing of unlawful robocalls or spoofed caller ID information. All customers and systems must comply with federal and state law.

4. Customer Vetting and Activation Controls

Gemini employs strict Know Your Customer (KYC) procedures before activating service, including verification of business identity and service needs. Activation includes call-rate limits, geo-blocks, and fraud detection triggers.

5. Call Traffic Monitoring and Controls

Gemini continuously monitors call traffic for anomalies such as high-volume short-duration calls, invalid numbering, or unusual patterns. Automated controls and blocks are applied when suspicious traffic is detected. Records are retained for traceback requests.

6. Caller ID Authentication / STIR/SHAKEN Status

Gemini Networking & Security LLC does not control the network infrastructure necessary to implement STIR/SHAKEN. Outbound calls are handed to upstream service providers that control the underlying voice network infrastructure and perform STIR/SHAKEN authentication.

7. Traceback Cooperation and Enforcement

Gemini fully cooperates with traceback requests from the FCC, law enforcement, and the Industry Traceback Group. Responses are provided within 24 hours, and offending traffic is immediately mitigated or terminated.

8. STIR/SHAKEN Implementation Explanation

Gemini Networking & Security LLC does not control the network infrastructure necessary to implement STIR/SHAKEN. Outbound calls are handed to upstream service providers that control the underlying voice network infrastructure and perform STIR/SHAKEN authentication. Gemini has implemented a Robocall Mitigation Program consistent with 47 CFR § 64.6305 and cooperates with traceback requests and investigations of suspected illegal robocall traffic.

9. Certification

I, the undersigned, certify under penalty of perjury that Gemini Networking & Security LLC has implemented the above-described robocall mitigation program in compliance with FCC rules.

Officer e-Signature

A handwritten signature in black ink, appearing to be 'RJG', is written over a horizontal line.

Date:

10-01-2026