

FCC Compliance – 47 CFR § 64.6305(d)(ii)-(iii)

1. Provider Information

- **Company Name:** BayFront Cloud LLC
- **FRN:** 0037724820
- **Address:** 1309 Coffeen Ave, STE 1200, Sheridan Wyoming, 82801
- **Contact Person:** Andrew Giardini
- **Website:** <https://bayfront.cloud>

2. Robocall Mitigation Program Overview

a. Policies and Procedures to Prevent Illegal Robocalls

BayFront Cloud LLC has implemented a comprehensive robocall mitigation program, including:

- **Know Your Customer (KYC):**
 - Verification of customer identity (business documentation, EIN, address, contact info)
 - Assessment of intended use of voice services
 - Screening for high-risk or suspicious activity prior to activation
- **Traffic Monitoring and Analysis:**
 - Ongoing monitoring of outbound call traffic for patterns indicative of illegal robocalling (e.g., high call volumes, short call durations, sequential dialing)
 - Automated alerts for abnormal traffic patterns
 - Prompt investigation and remediation of suspicious activity
- **Call Authentication:**
 - Implementation of STIR/SHAKEN protocols for SIP traffic where technically feasible
 - Participation in industry traceback efforts and cooperation with FCC/law enforcement
- **Customer Education and Enforcement:**

- Customers are required to agree to an Acceptable Use Policy prohibiting illegal robocalling and spoofing
- Ongoing education regarding compliance obligations
- Immediate investigation of robocall complaints or traceback requests
- Suspension or termination of service for violations

b. Compliance with 47 CFR § 64.6305(d)(ii)-(iii)

- BayFront Cloud LLC certifies that it has implemented the above procedures to prevent the origination of illegal robocalls.
- The company maintains records of mitigation practices and will update the FCC with any material changes.

c. Point of Contact for Robocall Mitigation Program

- **Name:** Andrew Giardini
- **Title:** Operations Manager
- **Email:** helpdesk@bayfront.cloud
- **Phone:** 307-429-4700

Certification:

I certify that BayFront Cloud LLC has implemented the robocall mitigation practices described above, in compliance with 47 CFR § 64.6305(d)(ii)-(iii).

Signature: Andrew Giardini

Date: December 9, 2025