

Robocall Mitigation Program Description

Palmer Telecom LLC

1. Company Overview

Palmer Telecom LLC provides low-volume, retail, end-user international voice calling services. Customers initiate calls for personal communications with family members located outside the United States. The company does not provide automated dialing, bulk calling, telemarketing, political calling, or call center services.

2. Customer Onboarding and Use Restrictions

Palmer Telecom LLC provides service directly to individual end users. Customers are provisioned for personal use and are prohibited from engaging in illegal robocalling, caller ID spoofing, or other abusive calling practices. The company does not knowingly provide service to telemarketers, lead generators, or automated calling operations.

3. Traffic Monitoring

The company monitors call activity using standard operational metrics, including originating identifiers, destinations, call duration, and usage patterns. Monitoring is proportional to call volume and designed to identify anomalous or suspicious calling behavior inconsistent with personal, human-initiated calling.

4. Complaint Handling and Enforcement

Palmer Telecom LLC maintains procedures to receive and investigate abuse complaints. Upon identification of potentially illegal or abusive calling activity, the company may take corrective action, including customer notification, service suspension, or termination.

5. Traceback Cooperation

Palmer Telecom LLC commits to cooperating with traceback requests from the Federal Communications Commission, law enforcement agencies, upstream providers, and the USTelecom Industry Traceback Group. The company will provide available call detail records in a reasonable timeframe consistent with applicable laws and regulations.

6. Ongoing Compliance

The company reviews and updates its robocall mitigation practices as necessary to remain compliant with FCC rules, including 47 CFR § 64.6305(a).