

ROBOCALL MITIGATION PROGRAM DESCRIPTION

GTC LLC

GTC LLC is a Voice Service Provider that originates voice traffic using upstream carrier and SIP service providers. GTC LLC does not directly implement STIR/SHAKEN authentication technology. Authentication and attestation of caller identification information are performed by upstream providers where applicable. GTC LLC maintains and implements a Robocall Mitigation Program consistent with the requirements of 47 CFR §64.6305 and relies on upstream providers for authentication measures under the exemption described in 47 CFR §64.6304.

1. Customer Vetting / Know Your Customer (KYC) Procedures

GTC LLC performs reasonable due diligence prior to onboarding customers. Customer onboarding includes verification of business identity, contact information, intended use of services, and acknowledgment of lawful use requirements. Customers must agree contractually to comply with all applicable telecommunications and anti-robocall regulations. High-risk applicants may be denied service at the company's discretion.

2. Traffic Monitoring and Detection of Suspicious Calling Patterns

GTC LLC monitors call traffic for indicators of suspicious or potentially unlawful activity. Monitoring includes review of call volumes, calling velocity, call duration patterns, complaint signals, and abnormal traffic behavior. Traffic exhibiting unusual or suspicious characteristics is subject to investigation and mitigation measures.

3. Enforcement Actions

If unlawful or suspicious traffic is detected, GTC LLC may take immediate enforcement action including temporary suspension, traffic blocking, or permanent termination of customer services. Enforcement actions are taken to prevent the origination or transmission of illegal robocalls or spoofed caller identification.

4. Cooperation with Regulatory Authorities and Traceback Requests

GTC LLC cooperates fully with the Federal Communications Commission (FCC), law enforcement agencies, and the Industry Traceback Group. The company commits to responding to traceback and investigative requests within 24 hours or as otherwise required by applicable rules and regulations.

5. Reliance on Upstream Provider Authentication

GTC LLC relies on upstream voice service providers to perform STIR/SHAKEN caller ID authentication where technically feasible. These upstream providers are responsible for attestation and authentication of calls originated through their networks. GTC LLC maintains relationships only with reputable upstream carriers that support industry-standard robocall mitigation practices.

6. Ongoing Compliance and Program Updates

GTC LLC commits to maintaining and updating its robocall mitigation procedures as FCC rules, industry standards, and best practices evolve. Policies and controls will be reviewed periodically to ensure continued compliance with federal regulations and to minimize the risk of illegal robocall traffic.

GTC LLC certifies that it has implemented the robocall mitigation practices described above and that these procedures are reasonably designed to prevent the origination and transmission of illegal robocalls while remaining compliant with applicable FCC regulations.