

FCC Robocall Mitigation Database (RMD) Filing – Lead Friendly LLC

****Status:**** Draft for review. Not yet filed.

****Filing portal:**** <https://fccprod.servicenow.services.com/rmd>

****Auth:**** FCC CORES login required (one-time setup at <https://apps.fcc.gov/cores>).

****Annual recertification:**** by March 1 each year.

****Update window:**** Material changes within 10 business days.

Why we're filing

Lead Friendly LLC operates a CRM + AI voice-agent SaaS that resells PSTN voice from Telnyx. Under 47 CFR § 64.6305 and the FCC's evolving guidance on the Robocall Mitigation Database, we believe Lead Friendly qualifies as a non-obligated reseller (originating service provider responsibility sits with Telnyx) but is nonetheless required – or strongly advised – to file a robocall mitigation plan, document KYC procedures, and provide a 24-hour traceback contact. The April 9, 2026 FCC Fact Sheet (DOC-420711A1) telegraphs that downstream blocking of providers without RMD filings and adequate KYC will tighten further.

The conservative posture is: file now, before any traceback arrives.

Section A – Provider Identification

Field	Value
Legal name	Lead Friendly LLC
Business street address	<<4600 DAVIS AVENUE S APT D164, RENTON WA 98055>>
Business email	support@leadfriendly.com
Business phone	+1 253-402-6951
FCC Registration Number (FRN)	<<0038428538>>
State of incorporation	Washington
Type of provider	Voice service provider (reseller)
Date of US voice service operations	<<2026-05-16>>
Originating service provider	Telnyx LLC (FRN 0028893540)

Section B – STIR/SHAKEN Implementation

Lead Friendly LLC does not directly originate, sign, or terminate voice traffic on the PSTN. All voice traffic on the platform is originated by Telnyx LLC under Telnyx's existing STIR/SHAKEN certificate and obligations.

Selection: ****No STIR/SHAKEN obligation – voice service provided exclusively through underlying carrier (Telnyx LLC).****

Lead Friendly LLC will not originate voice traffic outside of Telnyx without first re-evaluating its STIR/SHAKEN obligation under 47 CFR § 64.6301 and, if required, obtaining an SPC token and STI certificate per the FCC Third-Party Authentication Order (effective September 18, 2025).

Section C – Robocall Mitigation Plan

Lead Friendly LLC implements the following robocall mitigation practices on its platform. These practices are operationally enforced by code in production and apply to every outbound call originated by a Lead Friendly customer.

C.1 Know-Your-Customer (KYC)

Lead Friendly operates a four-tier KYC system. Capabilities are gated by tier, and tier transitions are recorded in an append-only `compliance\_audit\_log` for audit.

Tier	Identity verification	Business verification	AUP / ToS / AI Addendum acceptance	Capabilities unlocked
trial	Email + phone OTP	None	None	Sandbox only – no real numbers, no SMS, no outbound voice
solo	Government ID + selfie via verification provider (Stripe Identity / Persona)	Business website match	All three accepted, version-tracked with IP and user-agent	Buy phone numbers, send SMS, manual outbound voice
pro	Same as solo	+ EIN verification (IRS CP-575 letter) and business-address proof	All three accepted	+ AI outbound voice

| agency | Same as pro | + KYB with ultimate-beneficial-owner ≥25% verification, signed Master Services Agreement with TCPA reps and indemnification | All three accepted; counter-signed MSA | + white-label sub-accounts |

KYC procedures are codified in `src/lib/compliance/kyc-tier-rules.ts` and `src/lib/compliance/kyc-state.ts` in our codebase, and the `compliance\_kyc` and `compliance\_audit\_log` Postgres tables. AUP, ToS, and AI Compliance Addendum acceptance is recorded in `compliance\_acceptances` with version, document hash, IP address, and user-agent.

C.2 Customer Onboarding Vetting

For every new customer:

- Identity verification matching the tier required by the requested capability.
- Business verification (legal name, EIN, address, website) for any tier that places outbound calls.
- AUP, ToS, and AI Compliance Addendum acceptance is required before any phone-number provisioning.
- Use-case description is reviewed before AI outbound is enabled.
- Verticals classified as high-risk (debt collection except by licensed collectors, payday lending, lead-resale, MLM, get-rich-quick, gambling without lawful authorization) are denied or referred to upstream provider for review.

C.3 Outbound Traffic Controls

The following platform-immutable caps apply to every outbound call. Customers cannot relax them via UI or API.

- ****AI disclosure preamble**** prepended to every AI agent system prompt; agent must identify itself as AI on first turn and confirm AI status if asked.
- ****AI calling window****: 10 AM - 6 PM in contact's local timezone (tighter than federal 8 AM - 9 PM).
- ****Per-destination velocity****: maximum 1 call per 24 hours per destination phone, maximum 4 calls per 14 days per destination phone.
- ****Per-organization velocity****: 10 calls/min, 1,000 calls/day default caps.

- ****Prior Express Written Consent (PEWC)****: required and verified pre-dial for AI marketing calls. Implemented as the SQL function ``has_active_consent`` against the ``customer_consent_records`` ledger.
- ****Answering-machine detection (AMD)****: AMD-positive calls terminate without leaving a prerecorded message.
- ****Internal Do Not Call list****: per-organization opt-out list auto-includes any contact who has used a STOP keyword on any channel.
- ****Federal Do Not Call Registry****: customers complete their own SAN registration; the platform offers integrated scrubbing as a service. SAN-validation prompts surface before campaign launch.
- ****Reassigned Numbers Database (RND)****: integration in v2; for v1, customers are required by AUP to scrub against RND when state law (currently Maine) requires.
- ****Recording disclosure**** in two-party-consent jurisdictions is part of the AI disclosure preamble.

C.4 Analytics & Anomaly Detection

The platform monitors outbound traffic for indicators of abuse, including: short-duration call ratios, attempt-to-connect ratios, complaint rates, SIP 608 (Network Identity - Rejection) responses from terminating carriers, and STIR/SHAKEN attestation downgrades.

When a number or organization is flagged by an underlying carrier, an analytics partner (Hiya, TNS Call Guardian, First Orion), the FCC traceback consortium, or the platform's internal anomaly detector, the platform automatically quarantines the affected resource via the ``compliance_quarantine`` workflow. The customer is notified and given a 48-hour window to respond with consent records, scrub records, agent prompts, and a corrective-action plan. Failure to respond results in termination.

C.5 Cooperation with Carriers and Regulators

Lead Friendly will respond to all FCC traceback consortium requests, carrier complaints, regulatory inquiries, and law-enforcement requests within 24 hours. Records (consent, scrubs, call detail, message detail) are retained per regulatory minima and the customer subscription tier.

Section D – Point of Contact for Traceback

Role	Contact
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Primary 24-hour traceback	Mandeep Rao, Founder
Email	`mandeepashf@gmail.com`
Phone	`+1 253-402-6951`
Backup email	`support@leadfriendly.com`
Response SLA	24 hours

Section E – Certifications

By submitting this filing, the undersigned certifies that:

1. The information provided is true and correct to the best of the undersigned's knowledge.
2. Lead Friendly LLC will respond to all FCC traceback requests within 24 hours.
3. Lead Friendly LLC has implemented the robocall mitigation practices described in Section C.
4. Lead Friendly LLC will update this filing within 10 business days of any material change to the information herein.
5. Lead Friendly LLC will recertify this filing annually by March 1 each year.

Field	Value
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Authorized representative	Mandeep Rao
Title	Founder
Date	`<<2026-05-16>>`