

ROBOCALL MITIGATION PLAN

Gain Rhino Marketing Agency LLC

Filed in the FCC Robocall Mitigation Database pursuant to 47 CFR § 64.6305

1. Filing Entity Information

Legal Name: Gain Rhino Marketing Agency LLC

FCC Registration Number (FRN): 0038502902

Business Address: 2092 Blossom Lane, La Verne, CA 91750

State of Organization: California

Role in the Call Chain: Originating Voice Service Provider

2. Overview

Gain Rhino Marketing Agency LLC (“Gain Rhino” or “the Company”) is a voice service provider that resells voice origination and termination services—obtained from its underlying facilities-based carrier(s)—bundled within its cloud-based CRM and communications platform (crm.gainrhino.com). The Company provisions telephone numbers (DIDs) and configures call handling for vetted business customers to support those customers’ ordinary inbound and outbound business communications.

The Company’s customers are small and mid-sized businesses, primarily in the home-improvement trades (e.g., HVAC, plumbing, electrical) and healthcare practices (e.g., dental offices) located in the United States. The Company does not offer wholesale minutes to the general public and does not engage in, support, or permit mass outbound telemarketing, cold-calling campaigns, or bulk robocalling.

3. STIR/SHAKEN Status

The Company does not operate its own facilities-based network and does not independently authenticate calls using its own SPC token. Caller ID authentication under the STIR/SHAKEN framework is performed by the Company’s underlying facilities-based provider(s). Accordingly, the Company certifies under the “No STIR/SHAKEN Implementation” option and relies on the robocall mitigation program described in this Plan for all calls it originates, consistent with 47 CFR § 64.6305(a).

4. Reasonable Steps to Avoid Originating Illegal Robocall Traffic

4.1 Know Your Customer (KYC) and Onboarding

Before provisioning service to any customer, the Company takes affirmative, effective measures to verify the customer’s identity and legitimacy, including:

- Collecting and verifying the customer’s legal business name, physical business address, and a valid callback telephone number.
- Obtaining a government-issued identification document for an authorized representative of the customer.
- Obtaining business registration information and/or a tax identification number (EIN) where applicable.
- Documenting the customer’s intended, legitimate business use of the service.

- Retaining onboarding records for the duration of the customer relationship and a reasonable period thereafter.

The Company declines service to, or applies enhanced scrutiny to, applicants exhibiting indicators of illegal calling, such as requests for large quantities of numbers without a clear legitimate purpose, refusal to provide identifying documentation, or any known history of robocall or spoofing abuse.

4.2 Contractual Provisions and Acceptable Use Policy

Every customer agrees, as a condition of service, to the Company's service terms and Acceptable Use Policy, which prohibit:

- Originating illegal robocalls or any traffic that violates the Telephone Consumer Protection Act (TCPA), the Truth in Caller ID Act, the Telemarketing Sales Rule, or applicable state law.
- Transmitting inaccurate, misleading, or spoofed caller identification information.
- Placing calls to numbers on applicable Do-Not-Call lists absent a valid exemption or prior express consent.

Customers represent and warrant that they will obtain and maintain all legally required consents before placing calls. The Company reserves the right to suspend or terminate service immediately upon suspected violation.

4.3 Monitoring

The Company monitors account activity and call patterns for anomalies indicative of illegal traffic, including unusual spikes in outbound volume, abnormal call-completion patterns, and customer complaints. The Company does not currently contract with a third-party call analytics vendor; it relies on the call-blocking and analytics protections deployed by its underlying facilities-based provider(s), together with manual review of usage data and complaints. If the Company engages a third-party analytics vendor, it will update this filing within 10 days to identify the vendor.

4.4 Response to Identified Illegal Traffic

Upon identifying, or being notified of, suspected illegal robocall traffic originating through its service, the Company will promptly investigate and take effective mitigating action—which may include throttling, blocking, suspending, or terminating the offending customer—and will document the action taken.

5. Cooperation with Traceback and Enforcement

The Company commits to respond fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium (the Industry Traceback Group), and to cooperate with such entities in investigating and stopping any illegal robocaller that uses the Company's service to originate calls.

6. Principals, Affiliates, Subsidiaries, and Parent Companies

Onur Bozkurt, Managing Member (sole owner exercising management and control of the filing entity). The Company has no parent companies, subsidiaries, or affiliates.

7. Point of Contact (Traceback and Compliance)

Name: **Onur Bozkurt**

Title: **Owner**

Email: **onur@gainrhino.com**

Phone: **8184567588**

8. Certification

I certify that I am authorized to submit this filing on behalf of Gain Rhino Marketing Agency LLC, and that the information contained in this Robocall Mitigation Plan is true, accurate, and complete to the best of my knowledge.

Signature: *Onur Bozkurt*

Name: **Onur Bozkurt**

Title: **Owner**

Date: **06/04/2026**