

ROBOCALL MITIGATION PLAN

Lead Proz LLC

Filed pursuant to 47 CFR § 64.6305 — FCC Robocall Mitigation Database

Legal Entity Name	Lead Proz LLC
Business Address	1001 S Main St, Kalispell, Montana 59901, USA
Authorized Contact	Muhammad Faisal, Chief Executive Officer
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Provider Classification	Non-facilities-based / OTT voice service provider (reseller)
Plan Effective Date	Effective as of date of filing

1. Purpose and Regulatory Basis

This Robocall Mitigation Plan (the “Plan”) describes the policies, procedures, and operational practices that Lead Proz LLC (“the Company”) has adopted to prevent the origination of illegal robocalls on its network. The Plan is submitted to the Federal Communications Commission (“FCC”) through the Robocall Mitigation Database in accordance with 47 CFR § 64.6305 and the TRACED Act.

The Company is a non-facilities-based, over-the-top (OTT) voice service provider that furnishes voice communications to business end users using numbering resources from the North American Numbering Plan. Because the Company has not yet completed STIR/SHAKEN implementation, it certifies a complete robocall mitigation program as described in this Plan and commits to maintaining reasonable steps to avoid originating illegal robocall traffic until full STIR/SHAKEN authentication is in place.

2. Scope of Operations

The Company provides interconnected VoIP origination and termination services to business customers, including contact centers, small and medium-sized businesses, and independent professionals. The Company operates its own session border controller and softswitch infrastructure and routes traffic to and from end users via one or more upstream wholesale carriers.

This Plan applies to all voice traffic originated by or on behalf of the Company’s customers across all of the Company’s voice services.

3. Customer Vetting and “Know Your Customer” Procedures

The Company applies the following Know Your Customer (KYC) controls to every prospective customer before any traffic is permitted on the network:

- Collection of business formation documents (e.g., certificate of incorporation, business registration, or equivalent) confirming the customer is a legitimate operating entity.
- Collection of a valid government-issued identification document for the principal or authorized signatory of the customer account.
- Verification of the documents and the customer’s stated business purpose prior to account activation; no traffic is enabled until verification is complete.
- Collection and retention of customer contact information, including a responsible point of contact for compliance and traceback matters.
- A written service agreement requiring the customer to comply with all applicable federal and state laws governing telemarketing and automated calling, including the TCPA and FCC rules.

Onboarding records for each customer are retained for the duration of the relationship and for a reasonable period afterward, and are available to support traceback investigations and regulatory inquiries.

4. Acceptable Use and Prohibited Conduct

Each customer is bound by an Acceptable Use Policy incorporated into the service agreement. The policy expressly prohibits:

- Origination of illegal robocalls or any calling campaign that violates the TCPA, the Telemarketing Sales Rule, or FCC regulations.
- Transmission of inaccurate, falsified, or unlawfully spoofed caller identification information.
- Calling numbers on the National Do-Not-Call Registry in violation of applicable law.
- Any use of the service for fraudulent, deceptive, or abusive calling practices.

Violation of the Acceptable Use Policy is grounds for immediate suspension or termination of service, as described in Section 7.

5. Traffic Monitoring and Analysis

The Company monitors outbound traffic to detect patterns consistent with illegal robocalling. The Company’s monitoring program includes:

- Periodic manual review of Call Detail Records (CDRs) to identify anomalous calling behavior, including abnormally high call volumes, very short average call durations, low answer-seizure ratios, and high-volume calling to sequential or invalid numbers.
- Automated alerting on call-volume and calling-pattern spikes that exceed expected thresholds for a given customer, enabling prompt investigation.

- Review of customer traffic against expected use cases established during onboarding, with follow-up where actual behavior diverges materially from the stated business purpose.

When monitoring identifies suspicious activity, the Company investigates promptly, may require the customer to provide consent records or campaign documentation, and takes mitigating action up to and including suspension of the customer's traffic.

6. Cooperation with Traceback Requests

The Company fully cooperates with the industry traceback consortium (the USTelecom Industry Traceback Group) and with the FCC, law enforcement, and other authorized parties in tracing the source of suspected illegal traffic.

- The Company designates a monitored point of contact to receive and act on traceback requests.
- The Company commits to acknowledging and responding substantively to traceback requests within 24 hours of receipt.
- Upon identifying a customer as the source of illegal traffic, the Company takes prompt mitigating action, which may include warning, suspension, or termination of the offending customer in accordance with Section 7.
- The Company retains records sufficient to identify the originating customer of any call on its network.

7. Enforcement and Remedial Action

Where the Company identifies a customer originating illegal robocall traffic or otherwise violating the Acceptable Use Policy, it takes escalating remedial action appropriate to the severity and recurrence of the conduct:

1. Notification to the customer and a requirement to cease the offending activity and provide supporting documentation.
2. Temporary suspension of the customer's ability to originate traffic pending investigation.
3. Permanent termination of service for serious or repeated violations, or where the customer fails to cooperate.

The Company reserves the right to suspend traffic immediately, without prior notice, where necessary to stop ongoing illegal calling or to comply with a regulatory or traceback directive.

8. Upstream and Downstream Provider Practices

The Company selects upstream and downstream carrier partners that maintain their own robocall mitigation obligations and that are listed in the Robocall Mitigation Database. The Company does not knowingly accept traffic from, or route traffic to, providers absent from the Database where its rules require their presence, and it cooperates with its carrier partners on traceback and mitigation matters.

9. STIR/SHAKEN Implementation Status and Roadmap

The Company has not yet completed STIR/SHAKEN implementation and therefore certifies a robocall mitigation program under this Plan. The Company is actively pursuing full implementation, including registration with the Secure Telephone Identity Policy Administrator (iconectiv), acquisition of an Operating Company Number, and obtaining a Service Provider Code token and signing certificate from an authorized Certification Authority. Upon completing implementation and signing its outbound traffic, the Company will update its Robocall Mitigation Database certification accordingly.

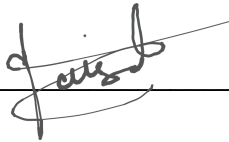
10. Recordkeeping, Review, and Updates

- The Company maintains customer onboarding records, traffic monitoring records, traceback correspondence, and enforcement actions in support of this Plan.
- The Company reviews this Plan periodically and updates it as its operations, technology, or regulatory obligations change.
- The Company will complete the annual Robocall Mitigation Database recertification required by the FCC, confirming that the information on file remains true and correct, and will update its filing promptly when material information changes.

11. Certification

The undersigned, an authorized representative of Lead Proz LLC, certifies that the foregoing Robocall Mitigation Plan is true and accurate, that the Company has implemented the practices described herein, and that the Company will take the reasonable steps described to avoid originating illegal robocall traffic.

Signature: _____



Name: Muhammad Faisal

Title: Chief Executive Officer

Date: _____ 16/06/2026