

WESTHAVEN PARTNERS LLC (d/b/a QuoteOtter)

Robocall Mitigation Program Description

Date	June 18, 2026
FRN	0038560561
Provider type	Voice Service Provider
Certification status	Option 3 - No STIR/SHAKEN implementation
Business address	6303 Owensmouth Ave, 10th Floor, Woodland Hills, CA 91367

1. Overview

Westhaven Partners LLC (d/b/a QuoteOtter) operates a pay-per-call call tracking and routing platform that connects publishers and advertisers/buyers. QuoteOtter does not directly originate calls on the public switched telephone network (PSTN); calls are routed through licensed underlying carriers.

QuoteOtter is committed to preventing its platform from being used to originate, route, transmit, carry, process, or facilitate illegal robocall traffic. All calls using the platform are subject to the mitigation practices described in this program.

2. STIR/SHAKEN Status and Option 3 Basis

QuoteOtter certifies under Option 3 that it has not implemented STIR/SHAKEN on its own platform. QuoteOtter lacks control over the underlying carrier network infrastructure necessary to sign or authenticate calls under the STIR/SHAKEN framework. PSTN voice transport, origination, termination, and any carrier-level authentication are performed by licensed underlying carriers.

Notwithstanding its STIR/SHAKEN implementation status, QuoteOtter applies the robocall mitigation program below and cooperates with carriers, the FCC, law enforcement, and the industry traceback consortium to identify and stop illegal traffic.

3. Customer Vetting and Onboarding

Before allowing any publisher or buyer to participate on the QuoteOtter platform, QuoteOtter performs customer vetting intended to verify identity, business legitimacy, and campaign purpose.

- Collects and reviews business identity information, including business name, responsible contact, address, website or business description, and payment or tax information where applicable.
- Reviews intended traffic source, campaign category, call flow, buyer relationship, and expected volume before enabling traffic.
- Requires review and acceptance of QuoteOtter's Terms of Service, which prohibit illegal robocalls, spoofed calls, fraudulent traffic, and calls that violate the Telephone Consumer Protection Act, FCC rules, or other applicable law.
- Reserves the right to request proof of consent, campaign documentation, publisher source information, or buyer authorization where traffic patterns, complaints, or other indicators warrant additional review.
- Does not knowingly accept traffic from anonymous, unverifiable, or previously terminated parties.

4. Upstream Provider and Carrier Procedures

QuoteOtter routes calls through licensed underlying carriers and maintains operational records sufficient to identify the publisher, campaign, buyer, phone number, timestamp, and carrier routing path associated with traffic on the platform to the extent such information is available to QuoteOtter.

When configuring call sources, QuoteOtter identifies the publisher, campaign, tracking number, and relevant routing information. QuoteOtter does not knowingly route traffic from an upstream source that refuses to provide information reasonably necessary to investigate suspicious or illegal call activity.

5. Ongoing Monitoring and Analytics

QuoteOtter uses internal platform monitoring, call detail records, campaign records, and operational analytics to identify traffic that may indicate illegal robocall activity. QuoteOtter does not currently use a third-party robocall analytics vendor for this mitigation program.

Indicators reviewed by QuoteOtter include:

- Unusually high call volumes from a single publisher, tracking number, campaign, buyer, or traffic source.
- High call abandonment, short-duration call patterns, repeated failed connections, or abnormal answer rates.
- Repeated consumer complaints, carrier notices, traceback notices, or regulatory inquiries tied to calls routed through the platform.
- Suspicious caller ID, number, campaign, source, timing, or geographic patterns inconsistent with the approved customer use case.

6. Traceback Response Commitment

QuoteOtter commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the USTelecom Industry Traceback Group or any successor industry traceback consortium.

QuoteOtter will cooperate with those entities by searching call records, identifying the relevant customer, publisher, campaign, buyer, tracking number, timestamp, and carrier path to the extent available, and providing responsive information consistent with applicable law and confidentiality obligations.

7. Investigation and Mitigation Process

When QuoteOtter receives a traceback request, complaint, carrier notice, regulatory inquiry, or internal alert indicating potential illegal robocall activity, the company follows a documented operational response process:

- Preserve relevant call records, routing records, customer records, campaign settings, and communications.
- Identify the publisher, buyer, campaign, tracking number, and carrier path associated with the traffic.
- Review traffic patterns, customer documentation, complaint details, consent or authorization records when available, and any related prior notices.
- Suspend, pause, block, or restrict the relevant publisher, buyer, number, campaign, or route while the review is pending when the facts indicate credible risk.
- Coordinate with underlying carriers, the FCC, law enforcement, and the industry traceback consortium as needed to complete the investigation and stop illegal traffic.

8. Termination of Bad Actors

If QuoteOtter determines that a publisher, buyer, or other platform participant used or attempted to use the platform to originate, transmit, route, carry, process, or facilitate illegal robocalls, spoofed calls, fraudulent traffic, or traffic that violates TCPA or FCC requirements, QuoteOtter will immediately suspend or terminate that party's access to the platform.

QuoteOtter may also block related numbers, campaigns, accounts, payment instruments, domains, or traffic sources, and may refuse future onboarding by the same party or related entities. QuoteOtter will cooperate fully with any related investigation by the FCC, law enforcement, carriers, or the industry traceback consortium.

9. Enforcement History and Program Updates

Based on company information available for this filing, QuoteOtter has not identified any formal FCC, law enforcement, or regulatory agency action or investigation in the prior two years with findings of actual or suspected wrongdoing by Westhaven Partners LLC, QuoteOtter, or commonly owned, managed, directed, or controlled entities concerning illegal robocalls, spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

QuoteOtter will review and update this program as its platform, carrier relationships, regulatory obligations, or mitigation practices change, and will update its Robocall Mitigation Database filing within applicable FCC timeframes when required.

10. Robocall Mitigation Contact

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Reference basis: FCC Robocall Mitigation Database Filing Instructions and 47 CFR 64.6305 requirements for a voice service provider robocall mitigation program description.