

ROBOCALL MITIGATION PROGRAM (RMP) PLAN & CERTIFICATION

FCC Form 47 CFR § 64.6305 Compliance Documentation — Partial STIR/SHAKEN Implementation

Entity / Filer Name:	Seer Law Group / Jim Core Realty Inc. (seerlaw.com)
Filing Category:	Voice Service Provider (Originating Provider)
Certification Option:	Option 2: Partial STIR/SHAKEN Implementation
Statutory Rules:	47 CFR § 64.6301(a), (b), § 64.6304, § 64.6305(a)
Filing Status / Date:	Active Compliance / August 2026

Section 1: Voice Service Provider Certification

The filer hereby certifies that all calls originated on its network are subject to a robust, verifiable Robocall Mitigation Program consistent with **47 CFR § 64.6305(a)**. The filer has implemented affirmative, reasonable measures to avoid originating illegal robocall traffic and commits to the following mandatory standards:

- **Mandatory 24-Hour Traceback Response:** Fully responding within **24 hours** to all official traceback inquiries received from the Federal Communications Commission (FCC), domestic and federal law enforcement entities, and the Industry Traceback Group (ITG) / designated Traceback Consortium.
- **Active Regulatory Cooperation:** Cooperating continuously with regulatory and industry bodies in detecting, investigating, and stopping any illegal robocall campaigns that may attempt to utilize the filer's facilities.
- **Database Standing:** Formally certifying that no prior certification has been revoked, suspended, or removed by Commission action, and the filer has not been barred from filing in the FCC Robocall Mitigation Database (RMD).

Section 2: Partial STIR/SHAKEN Implementation & Exemption Statement

Statutory Basis under 47 CFR § 64.6304 & § 64.6301:

The filer originates voice traffic through modern IP-based Session Initiation Protocol (SIP) architecture (Amazon Connect / AWS Cloud Telephony) where STIR/SHAKEN cryptographic call authentication (Pass-Through / Outbound Attestation) is implemented on IP-enabled portions of its telephony paths via upstream certified Voice Service Providers and Session Border Controllers (SBCs). Non-IP segments, legacy Public Switched Telephone Network (PSTN) interconnects, and non-tokenized trunks lacking cryptographic certificate authority (STI-CA) access operate under the continuous non-IP exemption set forth in **47 CFR § 64.6304**. All calls originated on the IP portion of the network comply with **47 CFR § 64.6301(a) and (b)**.

Section 3: Detailed Robocall Mitigation Program (RMP) Description

Pursuant to 47 CFR § 64.6305(a)(2), the filer enforces a comprehensive, multi-layer robocall mitigation system:

1. **Rigorous Know-Your-Customer (KYC) & Due Diligence:**
 - All customer accounts, internal departments, and dialing entities undergo strict identity verification, corporate documentation review, and legitimate business use authorization prior to trunk provisioning.
 - Outbound calling capability is restricted exclusively to validated, enterprise-authorized telephone numbers assigned directly to the entity.
2. **Calling Party Number (CPN) & Anti-Spoofing Verification:**

- Outbound Caller ID generation is strictly enforced via software routing tables to authorized North American Numbering Plan (NANP) numbers.
- Transmission of unassigned, invalid, unallocated, or national/international reserved numbers is blocked automatically at the gateway level.

3. Continuous Call Analytics & Anomaly Detection:

- Network traffic patterns are monitored in real-time for high-velocity bursts, abnormal short-duration calls (<6 seconds), high failure rates, and auto-dialer signatures.
- Suspicious call surges are automatically flagged, throttled, and escalated for immediate administrative review.

4. TCPA & Do-Not-Call (DNC) Adherence:

- All communications originating across the network strictly comply with the Telephone Consumer Protection Act (TCPA), FTC Telemarketing Sales Rule (TSR), and National Do-Not-Call Registry standards.

5. Dedicated 24-Hour Traceback Escalation Protocol:

- The filer maintains an automated, high-priority incident channel monitored 24/7/365 for traceback inquiries. Upon receipt of a traceback notice, engineering logs are immediately cross-referenced to identify originating source and trunk, response is provided within 24 hours, and non-compliant streams are terminated immediately.

Officer Certification & Attestation:

I hereby declare and certify under penalty of perjury that the foregoing statements, certifications, and Robocall Mitigation Program descriptions are true, accurate, and complete.

Authorized Signature

Name: James / Principal Officer

Title: Managing Officer / Telephony Administrator

Date

Entity: Seer Law Group / Jim Core Realty

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