

ROBOCALL MITIGATION PROGRAM DESCRIPTION

SECTION 1: FILER INFORMATION

- **Company Name:** Graduation Alliance
 - **FCC Registration Number (FRN):** 0038832382
 - **Filing Type:** Non-Gateway Intermediate Provider Filing
 - **Business Type:** Standard Enterprise (Educational Services / Business Operations)
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SECTION 2: PURPOSE AND NETWORK ARCHITECTURE

Graduation Alliance, Inc. is a standard business enterprise that utilizes cloud communications and proprietary software platforms to manage inbound and outbound communications with students and prospective students. The company is not a telecommunications carrier, facilities-based service provider, or reseller of voice services, and does not hold an Operating Company Number (OCN).

The company's internal network architecture utilizes upstream, FCC-registered Voice Service Providers (primarily Bandwidth, Inc.) to provision inbound numbers. Inbound traffic consists of multi-channel communication (SMS and Voice). To facilitate routing, the company's internal system splits these paths—ingesting SMS into a proprietary student-chat interface while simultaneously routing the voice portion of the inbound call via automated call forwarding to a secondary internal Interactive Voice Response (IVR) phone system for student routing.

Because the company acts as an internal transit platform for traffic originating on an authorized provider's network, it does not possess or utilize direct STIR/SHAKEN cryptographic signing keys. The obligation to generate STIR/SHAKEN digital signatures resides with the originating service provider.

SECTION 3: ROBOCALL MITIGATION POLICIES AND PROCEDURES

To ensure compliance with 47 CFR § 64.6305(c) and protect the integrity of the Public Switched Telephone Network (PSTN), Graduation Alliance, Inc. has implemented the following strict robocall mitigation controls:

1. Know Your Customer (KYC) & Internal Traffic Sourcing

- **Source Restrictions:** The company strictly prohibits any third-party external entities, resellers, or unauthorized users from generating traffic or passing calls through its network.
- **Legitimate Use Cases:** Network access is restricted exclusively to authorized employees and automated system functions communicating with established students or individuals who have explicitly opted into communications.
- **No Wholesale Routing:** The company does not offer, sell, or facilitate wholesale transit services, dialer traffic management, or open SIP trunking to external parties.

2. Traffic Monitoring and Anomaly Detection

- **Volume Constraints:** The company monitors call volumes and routing logs across its internal platforms to identify any abnormal spikes in concurrent calls or calling frequencies that deviate from normal student-advising business hours.
- **Rapid Isolation:** In the event that any internal system credential or API key is compromised, automated network protocols are in place to instantly isolate the affected system block and terminate all associated voice routing capabilities.

3. Traceback Cooperation

- **24-Hour Commitment:** Graduation Alliance, Inc. commits to responding fully and within 24 hours to all formal traceback requests from the Federal Communications Commission (FCC), federal/state law enforcement agencies, and the Industry Traceback Group (ITG).
- **Point of Contact:** The company maintains a dedicated compliance point of contact to immediately investigate, trace, and report on any specific call headers or routing chains flagged by authorities.

SECTION 4: EXECUTIVE CERTIFICATION

I hereby certify under penalty of perjury that the foregoing Robocall Mitigation Program Description has been reviewed, is active within Graduation Alliance, Inc., and effectively mitigates the origination or transit of illegal robocalls or spoofed communications across our internal systems.

Authorized Signature: 

Printed Name: Charity Carney

Title: Chief Technology Officer

Date: 09-02-2026