AgentsRun LLC
Robocall Mitigation Program

Pursuant to the rules of the Federal Communications Commission, including 47 CFR Section 64.6305 (Robocall Mitigation and Certification), AgentsRun LLC has implemented the following Robocall Mitigation Program:

Preventing Illegal Traffic

AgentsRun LLC is committed to compliance with the Telephone Customer Protection Act (TCPA), the TRACED Act (Telephone Robocall Abuse Criminal Enforcement and Deterrence) and the rules of the Federal Communications Commission pertaining to the prevention of illegal robocalling, fraudulent calling and other illegal use of its network. To that end, AgentsRun LLC requires each customer to provide information that enables AgentsRun LLC to "know its customers" and properly conduct the necessary due diligence to comply with the law and protect its network.

Due Diligence

AgentsRun LLC conducts due diligence with respect to each customer, both those existing prior to the date of this Robocall Mitigation Program and new customers, that is designed to ensure the customer will not originate illegal robocall traffic, or other illegal traffic, and includes:

- The proper formation and good standing of the customer entity, including whether it is foreign or domestic
- A description of the customer's business, including whether the customer uses any auto-dialing technology
- The physical location of the customer's business
- A review of the customer's website and mainstream social media accounts
- Obtaining the customer's current and prior IP addresses for review, including whether they are foreign
- Determining the customer's ownership and management, and
- Ascertaining whether there is any litigation pertaining to the customer or its principals.

Wholesale Customers

AgentsRun LLC will only accept traffic for termination from carrier customers (if any) that have an active registration in the Robocall Mitigation Database. AgentsRun LLC will review the customer's Robocall Mitigation Program on file with the FCC.

For any wholesale customers, AgentsRun LLC also investigates:

- Whether the customer has been determined by US Telecom's Industry Traceback Group to be a "Non-Cooperative Voice Service Provider"
- Whether the customer has been blocked from another voice service provider's network after being determined to have violated laws or regulations pertaining to illegal robocalling, fraudulent calling, illegal telemarketing practices or otherwise has been determined to be a "bad-actor upstream voice service provider"
- Whether the customer has implemented the STIR/SHAKEN Authentication Framework
- Obtaining assurance that the wholesale customer will promptly provide the identity of its customer or end user that was the source of reportedly illegal call traffic that the customer routed to AgentsRun LLC
- Whether the customer is registered with the Universal Service Administrative Company and has obtained a Form 499 Filer ID.

Autodialed Call Traffic

For any customer that AgentsRun LLC determines will transit autodialed call traffic, AgentsRun LLC will not receive any call traffic from such customer until the customer assures AgentsRun LLC it has taken reasonable steps to screen the legitimacy of the proposed autodialed call traffic, including, without limitation, obtaining, verifying and providing to AgentsRun LLC the following:

- the name, point of contact and contact information for the entity on whose behalf the originating caller is proposing to make the autodialed calls
- a description and sample recording or transcript (in English) of the proposed autodialed calls
- a list of the proposed ANIs to be autodialed
- the originating caller's subscription number to the Federal Do-Not-Call Database and any applicable state Do-Not-Call Databases
- a statement as to whether the originating caller would be undertaking the proposed calls with the consent of the proposed autodialed call recipients and, if so, a description and sample evidence of how such consent was obtained
- the proposed calls per second for the relevant autodialed call campaign
- the proposed dates of the relevant autodialed call campaign.

Traceback Requests

AgentsRun LLC commits to respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls.

STIR/SHAKEN Implementation

AgentsRun LLC has no switch and resells the hosted VoIP solution of its wholesale provider. Such wholesale provider assigns attestation levels under the STIR/SHAKEN framework for all calls that AgentsRun LLC originates through the wholesale provider.

Call Blocking and Analytics

AgentsRun LLC will block services to a customer if it determines that the customer is using the services for illegal robocalling.

AgentsRun LLC uses no internal analytic systems, software or third-party vendors at this time to identify and block illegal robocall traffic. Its wholesale provider may employ such systems.