

CALLFIRE, INC. ROBOCALL MITIGATION PLAN

Company: CallFire, Inc. dba EZ Texting

Name of Signatory: Vijesh Mehta

Title of Signatory: Chief Executive Officer

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Other business names associated with Company: EZ Texting, callfire.com, eztexting.com

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CallFire, Inc. dba EZ Texting (hereinafter called "EZ Texting") is a small voice services provider aiming to meet the requirements under 47 C.F.R. § 64.6304. Accordingly, EZ Texting is required to implement, and certify to the implementation of, a Robocall Mitigation Plan to ensure that illegal traffic does not originate on their networks by implementing STIR/SHAKEN.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database

EZ Texting's designated contact for Robocall Mitigation issues is:

Sarah Giraldi
Director, Governance and Messaging Operations
CallFire, Inc. dba EZ Texting
548 Market St, Suite 44523
San Francisco, CA 94104

Telephone: 757-879-6275

E-Mail: carrierops@callfire.com

EZ Texting is not a foreign voice service provider.

All voice traffic that originates on our network is subject to the following robocall mitigation policies. EZ

Texting has implemented a customer vetting program, also known as Know Your Customer, and collects and verifies information about each commercial customer, and mandates that the customer provide additional information if it requires large capacity calling. In addition to tracking digital biometrics (IP address, payment location, country of login, etc.), EZ Texting assigns dedicated managers to large commercial customers to fully understand and vet sending processes and message intention. Any other identified potential risky customers are required to pass an identity verification process that requires uploaded documentation of a valid I.D. and a selfie that must match the provided ID. To protect against Account Take Overs, EZ Texting has upgraded its Multi Factoring Authentication from an email MFA to a phone based SMS MFA.

- The majority of EZ Texting's customer base consists of small businesses who do not generally generate robocalls.
- Heightened review of customers headquartered outside of the United States.
- Require customers operating under Master Service Agreement and the Company's Terms of Service to assist in traceback investigations.
- Monitor traffic patterns to detect unusual levels of activity above EZ Texting's threshold based on an average of typical customer use, and investigate any anomalies. EZ Texting utilizes software created by Sift to monitor digital biometrics of users engaging with its platform. Signals such as IP address, login events, phone numbers, email age, and order history are fed into an AI-driven platform to create a risk score. If a user exceeds a pre-defined risk score, their access to the platform is automatically suspended.
- We have a new process in place where we now send voice calls through our content filtering software to proactively block any malicious or fraudulent content.

EZ Texting's Terms of Service and/or MSAs contain prohibitions on Robocalling, and allow EZ Texting to suspend or terminate service if it determines that the customer is using EZ Texting's services for Robocalling.

- EZ Texting is actively engaged with anti-abuse industry groups such as the Mobile, Messaging, Malware Anti-Abuse Working Group (M3AAWG) and Communications Fraud Control Association (CFCA) to ensure our practices are continually adapting to combat emerging threats.

EZ Texting will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

CallFire, Inc. dba EZ Texting

By: Vijesh Mehta

Vijesh Mehta, CEO

Dated: 02 / 23 / 2026

CERTIFICATE *of* SIGNATURE

REF. NUMBER
K7KYB-4YXXZ-VKSJN-ZWVR6

DOCUMENT COMPLETED BY ALL PARTIES ON
24 FEB 2026 00:35:22
UTC

SIGNER

VIJESH MEHTA

EMAIL
VMEHTA@CALLFIRE.COM

TIMESTAMP

SENT
23 FEB 2026 20:48:38

VIEWED
24 FEB 2026 00:35:05

SIGNED
24 FEB 2026 00:35:22

SIGNATURE

Vijesh Mehta

IP ADDRESS
64.125.142.138

LOCATION
LOS ANGELES, UNITED STATES

RECIPIENT VERIFICATION

EMAIL VERIFIED
24 FEB 2026 00:35:05

