

Robocall Mitigation Program Description

FathomTel, Inc.
February 27, 2026

1. Description of Services and Call Flow

FathomTel, Inc. provides a second-line mobile communications application that enables authenticated end users to place and receive voice calls and text messages using telephone numbers provisioned through reputable, U.S.-based telecommunications providers subject to FCC regulation.

Users are assigned telephone numbers hosted by underlying provider infrastructure and may originate calls exclusively through the mobile application user interface.

FathomTel does not provide:

- Bulk outbound calling services
- Automated or predictive dialing
- Prerecorded message delivery tools
- Programmable voice APIs
- Web-based dialing portals
- Third-party access to its telephony infrastructure
- Wholesale, intermediate, or gateway carrier services

All call initiation requires manual interaction by an authenticated end user within the application.

2. STIR/SHAKEN Implementation Status

FathomTel does not operate switching infrastructure, session border controllers, SIP network elements, or other equipment necessary to independently implement STIR/SHAKEN authentication and does not hold a Secure Telephone Identity (SPC) token.

All outbound calls transit through underlying telecommunications provider infrastructure that performs STIR/SHAKEN signing in accordance with applicable FCC requirements.

Under current FCC rules, providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN authentication do not have an independent implementation obligation.

Accordingly, FathomTel files as a Voice Service Provider without a STIR/SHAKEN implementation obligation.

3. Know-Your-Customer (KYC) Procedures

Before outbound calling is enabled:

- The mobile application must be downloaded through the Apple App Store or Google Play.
- Access to the application requires a valid Apple ID or Google account subject to platform identity and billing controls.
- Users must create an authenticated account within the application.
- Users must verify their email address.
- Users must complete a valid transaction through Apple App Store or Google Play billing systems prior to activation of calling functionality.
- Telephone numbers are assigned only through authorized provider channels and are uniquely associated with the authenticated user account.

Each outbound call is attributable to an authenticated user account associated with a specific assigned telephone number.

FathomTel does not permit users to originate calls using telephone numbers not assigned to their account.

4. Reasonable Steps to Avoid Originating Illegal Robocall Traffic

FathomTel implements layered preventive, detective, and responsive controls to reduce the risk of illegal robocall origination.

Preventive Controls

- Outbound calls may be placed only by authenticated users through the mobile application interface.
- No automated, bulk, predictive, or API-based dialing is supported.
- Call initiation requires active user interaction.
- Outbound calling is subject to internal rate limits and velocity controls.

Monitoring and Detection

FathomTel monitors traffic for patterns inconsistent with expected human dialing behavior, including but not limited to:

- High outbound call velocity
- Excessive short-duration calls
- High unique destination counts
- Destination patterns consistent with robocall campaigns
- Behavioral anomalies inconsistent with normal consumer usage

Mitigation and Enforcement

Where anomalous or abusive patterns are detected:

- Accounts may be automatically rate limited or restricted.
- Accounts may be suspended pending investigation.
- Accounts may be permanently terminated for policy violations.

FathomTel also acts promptly upon receipt of abuse notifications or Acceptable Use Policy (AUP) complaints from underlying telecommunications providers and may immediately restrict or suspend associated accounts while investigating.

Terms of Service prohibit robocalling, spoofing, unlawful telemarketing, scams, impersonation, and other illegal use.

5. Upstream and Downstream Traffic Controls

FathomTel obtains PSTN connectivity exclusively through reputable, U.S.-based telecommunications providers subject to FCC regulation.

FathomTel does not accept call origination traffic from other voice service providers, intermediate providers, gateway providers, or wholesale customers.

All originated traffic is attributable solely to authenticated end users of the mobile application.

6. Traceback Commitment

FathomTel commits to responding within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, or recognized industry traceback organizations and to cooperating fully in lawful investigations into suspected illegal robocall activity.

7. Enforcement History

FathomTel, Inc. (and any entity under common ownership or control) has not, within the prior two years, been subject to formal Commission or law enforcement action alleging origination or facilitation of illegal robocalls or a deficient Robocall Mitigation Database filing.

8. Annual Review

This mitigation plan is reviewed annually and updated as necessary to reflect changes in service functionality, network architecture, or regulatory requirements.