



Mezmo Corporation dba InnoCaption: Robocall Mitigation Plan
March 2, 2026

Mezmo Corporation dba InnoCaption (“InnoCaption”),¹ FCC Registration Number 0031144991, hereby submits its Robocall Mitigation Plan (“Plan”) pursuant to section 64.6305 of the rules established by the Federal Communications Commission (“FCC” or “Commission”).² This Plan is current as of its submission date and may be subject to change as necessary.

InnoCaption is a Telecommunications Relay Service (“TRS”) Fund-eligible provider of Internet Protocol Captioned Telephone Service (“IP CTS”). IP CTS is a form of TRS used by persons who are deaf or hard of hearing that voice for themselves but have difficulty hearing their phone calls. IP CTS allows the user to simultaneously listen to the other party and read the captions of what the other party in a telephone conversation is saying. IP CTS uses the Internet – rather than the telephone network – to provide the audio connection and captions between the IP CTS user and the IP CTS service provider. InnoCaption’s IP CTS offering is app-based and can be used on compatible Apple and Android devices without requiring specialized equipment.

In order to provide IP CTS, InnoCaption procures both ten-digit North American Numbering Plan (“NANP”) telephone numbers and voice service from interconnected voice over Internet protocol (“VoIP”) providers. InnoCaption does not maintain an operating company number or have direct access to telephone numbers from the NANP Administrator and/or the National Pooling Administrator.

STIR/SHAKEN Implementation. InnoCaption is not a telecommunications carrier or provider of private telecommunications due to the nature of its IP CTS service, as described above. However, to the extent that InnoCaption may be considered a voice service provider subject to the FCC’s caller identification rules, it is exempt from the STIR/SHAKEN implementation obligation pursuant to the FCC’s rules and Orders:

- (1) As an IP CTS provider, InnoCaption does not submit, and is not required to submit, an FCC Form 499-A. Accordingly, InnoCaption is incapable of obtaining a Service Provider Code (“SPC”) token under the Governance Authority’s revised SPC Token

¹ InnoCaption has acquired CaptionMate Call Captioning Service, which uses advanced automated speech recognition technology to provide real-time captions of phone calls for users. The CaptionMate app is supported by the InnoCaption team as a standalone service. The Plan detailed herein therefore applies to both the InnoCaption-branded services along with the CaptionMate app unless otherwise indicated. These services are collectively referred to as “InnoCaption” and individually referred to as the “InnoCaption app” and the “CaptionMate app” where appropriate.

² To the extent necessary, InnoCaption requests that the confidential information herein be included under its Request for Confidential Treatment, as filed in WC Docket No. 17-97 on February 26, 2024.

Access Policy and is precluded from implementing STIR/SHAKEN directly at this time.³

- (2) InnoCaption is also excluded from STIR/SHAKEN implementation because of its “lack [of] control over the network infrastructure necessary to implement STIR/SHAKEN.”⁴ InnoCaption does not own or control any switches and is not involved in the routing of any voice traffic processed as IP CTS.

Notwithstanding the above, InnoCaption created and implemented the Plan set forth herein.

Commitment. InnoCaption commits to: (a) taking all reasonable steps to avoid originating illegal robocall traffic; (b) responding fully within twenty-four (24) hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium; and (c) cooperating with such entities in investigating and stopping any illegal robocallers that use InnoCaption’s service to originate calls.

Company Information. The contact information for the individual within InnoCaption responsible for addressing robocall mitigation-related issues is as follows:

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Customer Vetting Process. As indicated above, InnoCaption procures NANP telephone numbers from its provider partners. Specifically, the InnoCaption app procures its numbers from [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] and the CaptionMate app procures its numbers from [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] (collectively, the “Provider Partners”). Before assigning any one of these telephone numbers to an individual, the individual must provide InnoCaption registration information designed to ensure that they are a valid IP CTS user. Among other details, InnoCaption obtains from each potential customer their full name, complete and verifiable registered address, date of birth, and the last four digits of their Social Security Number. InnoCaption also uses text message dual-factor authentication to register new customers. Ultimately, InnoCaption will be required to provide this registration information to the TRS User Registration Database (“TRS-URD”) for each new and existing customer and then validate the eligibility of each call by querying the TRS-URD.

³ See 47 CFR § 64.6304(b).

⁴ See *Call Authentication Trust Anchor et al.*, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, para. 40 (2020) (excluding from a STIR/SHAKEN implementation obligation those providers that lack control over the necessary network infrastructure); *Call Authentication Trust Anchor*, Second Report and Order, 36 FCC Rcd 1859, para. 19 (2020). See also 47 C.F.R. § 64.6305(d)(2)(i).

InnoCaption does not “renew” its customers service plans. Rather, once a customer is found to be a valid, qualified IP CTS user and completes the registration process, the user remains a customer of InnoCaption until they stop using the service or they delete their InnoCaption account.

Upstream Provider Vetting Process. Because InnoCaption does not control any network infrastructure in connection with its provision of IP CTS, InnoCaption does not have any upstream providers. To the extent InnoCaption could be considered a voice service provider, its only upstream providers would be its Provider Partners, which supply InnoCaption with underlying NANP numbering resources and deliver InnoCaption’s IP CTS customer calls to and from the PSTN. As a result of these relationships, the Provider Partners authenticate the InnoCaption calls that originate on their respective systems and are subject to STIR/SHAKEN. Additional information regarding the Provider Partners’ STIR/SHAKEN implementations is publicly available.

Authentication and Monitoring of Outbound Calls. As discussed herein, InnoCaption relies on its underlying Provider Partners to authenticate the calls that may originate on InnoCaption’s IP CTS services and are subject to STIR/SHAKEN. InnoCaption and its Provider Partners also monitor end users’ calling patterns. If an anomaly is identified, InnoCaption will investigate and take remedial actions including, where appropriate, terminating service.

Monitoring and Mitigation for Inbound Calls. With respect to incoming calls, InnoCaption relies in part on the technical tools inherent in its Provider Partner networks, on which the InnoCaption services are processed. These may include caller authentication and verification, for example. InnoCaption does not currently utilize a third-party analytics vendor for the CaptionMate app. InnoCaption has utilized the third-party application [BEGIN CONFIDENTIAL] [REDACTED]. [END CONFIDENTIAL]

Customer Terms of Use. Every InnoCaption customer agrees to comply with the company’s Terms of Use governing IP CTS. Among other provisions, the Terms of Use prohibit customers from using InnoCaption’s service to engage in any harassing, threatening, defamatory, commercial, offensive, or illegal purposes. The Terms of Use further specify that InnoCaption’s service can only be used for communications permitted by FCC rules, and customers agree to observe all governing statutory and regulatory requirements.

Ongoing Robocall Mitigation. InnoCaption anticipates that its Plan will evolve over time, and InnoCaption will update this submission within ten business days following the date of any changes to the Plan.

InnoCaption Ownership Information. Two individuals, Sungho “Joseph” Lee and Joseph Duarte, have *de jure* and *de facto* control over InnoCaption.

- The following individuals hold equity and voting rights in InnoCaption: Sungho “Joseph” Lee, Joseph Duarte, and Margaret Duarte.
- InnoCaption’s executives and officers are as follows: Joseph Duarte (Co-CEO), Sungho

“Joseph” Lee (Co-CEO), Wonjae Cha (CTO), Haesung “Paul” Lee (COO), and Cristina Duarte (Senior Director of Regulatory Affairs).

- The following individuals serve on InnoCaption’s Board of Directors: Sungho “Joseph” Lee, Joseph Duarte, and Haesung “Paul” Lee.

Please do not hesitate to contact the undersigned with any questions regarding the Plan.

Submitted by,

Cristina O. Duarte
Senior Director of Regulatory Affairs