

Robocall Mitigation Plan – Ethiqs

1. Company Overview

Ethiqs, Inc. is a software company providing AI-driven voice and messaging platforms for enterprise customers. Ethiqs enables customers to deploy AI voice and messaging agents using phone numbers provisioned exclusively through upstream carriers such as Twilio and Sinch. Ethiqs does not maintain its own numbering resources or PSTN interconnections.

All call origination, termination, and STIR/SHAKEN signing is performed by certified upstream carrier partners. Ethiqs operates customer-facing services through its affiliated company, Tells, Inc., which contracts directly with customers. Carrier relationships and numbering resources remain under Ethiqs, Inc.

2. STIR/SHAKEN Implementation

All outbound calls placed by Ethiqs customers utilize numbering resources provided by Twilio and Sinch, which perform STIR/SHAKEN signing on outbound calls. Ethiqs does not issue attestation tokens directly. Partial STIR/SHAKEN attestation applies due to customer-provided caller ID information, legacy interconnection scenarios, and technical limitations that prevent full attestation in all cases. Ethiqs ensures that calls are signed with the highest level of attestation available.

3. Know Your Customer (KYC) Program

New Customers

Prior to onboarding, Ethiqs collects and verifies customer identity information including legal entity name, physical address, website, and use-case description. Ethiqs utilizes third-party identity verification services, including Authenticate.com, as part of its Know Your Customer (KYC) program. Customers are reviewed for high-risk or prohibited use cases before traffic is enabled.

Existing Customers

Ethiqs applies its KYC program on an ongoing basis to existing customers through traffic monitoring, complaint analysis, opt-out rate review, and periodic compliance assessments. Customers exhibiting anomalous traffic patterns or elevated risk indicators are investigated and may be suspended or terminated.

4. Traffic Monitoring and Analytics

Ethiqs monitors traffic behavior using a combination of internal analytics and third-party monitoring and verification tools, including services provided by upstream carriers and vendors such as Authenticate.com. Monitoring includes review of call volume, call duration, call rates, complaint signals, opt-out rates, and other indicators associated with illegal or abusive robocall activity.

5. Robocall Mitigation Measures

Ethiqs maintains a robocall mitigation program consistent with 47 CFR § 64.6305(a). Reasonable mitigation steps include customer suspension or termination, rate limiting, traffic throttling, blocking or disabling traffic associated with suspected illegal activity, cooperation with traceback requests, and enforcement of caller ID authorization and number assignment controls.

6. Affiliates and Upstream Providers

Affiliated Company: Tells, Inc.

Upstream Providers: Twilio, Inc. and Sinch, Inc.

7. Point of Contact

Compliance Contact: David Schlaegel

Email: ethiqs@ethiqs.com

Phone: (833) 928-2640

8. Certification

Ethiqs certifies that it maintains and enforces the above robocall mitigation practices and cooperates fully with FCC, law enforcement, and traceback requests.