

Waitlist Me Robocall Mitigation Plan

Overview - Waitlist Me is a simple application and service for helping restaurants and other small businesses manage their waitlists and reservations. Customers of these businesses give their phone numbers to the business staff when visiting to be notified when the business is ready for them. Our voice services comprise of only a single, optional, templated voice message per customer. These messages are manually initiated by the business staff when they are ready to serve customers and only used when customers don't notice and respond to prior text messages letting them know the business is ready for them.

Customer Vetting – We require a valid email, business address, and business phone number for all customers, and we manually screen new sign ups and upgrades to ensure they are legitimate businesses. We also require a valid credit card and authorized payment before any voice call notifications can be made.

Restricted Use Case – The call notifications we allow through our service are designed to be simple for the very specific task of notifying a person when it is their turn, and as such they have many limitations that make them less suited for abuse including:

- **Manual input and triggering** – All phone numbers must be manually inputted into Waitlist Me by a person along with a customer's name, and the single voice notification that can be sent for each phone number entered must be manually triggered by pushing the notification button that is available for that customer's visit. We don't have any features for importing phone number lists or automating phone call notifications.
- **Simple templates** - The vast majority of phone call notifications that are sent from Waitlist Me customers use one of our eight predefined pre-recorded templates, which wouldn't be very useful outside the specific context of letting a customer know it is their turn. The content of these 8 template options are: (1) Your table is now ready. Please return to the restaurant to be seated. Thank you. (2) Your table is now ready. Please check in with the restaurant as soon as possible. (3) We are done. Please come by at your convenience. (4) Your order is now ready to be picked up. (5) It's your turn. Please come back for your appointment. (6) We are ready for you. Please come by as soon as possible. (7) Your turn is coming up soon. Please check in at the reception area. Thank you. (8) Your appointment is now available. Please return to reception and check in. Thank you.
- **Text-to-speech** – A small percentage of our customers use text-to-speech in their phone call notifications to have a more customized message. These are also templated, meaning that the same message needs to be used for all customers, rather than created on the fly or customized for each customer, so that we can review changes made to these call notifications to avoid abuse. They are also limited to a 160 character limit for the message.
- **Single purpose** – We don't allow phone numbers entered into our system to be used for anything other than the single phone call notification for letting a person know it is their turn. Phone numbers are not sold to or shared with third parties, and we don't even allow our customers to export the phone numbers from our system.

Monitoring – We monitor individual and aggregate phone call usage for abnormal frequency, restricted content, and suspicious patterns. We are able to track any call made through our system back to a

specific customer, and we have internal tools and reports for doing quality assurance analysis and investigating potential abuse cases.

Termination – While rare, in cases of abuse, we block accounts from using our service and sending any further call notifications. Our Terms of Service allow us to suspend or terminate accounts sending any kind of illegal or abusive voice traffic.

Third-Party Analytics Vendors - Waitlist Me uses Google Cloud as a third-party analytics vendor to support our robocall mitigation program. Specifically, we utilize Google Cloud's Monitoring and Log Analytics tools to perform a variety of analytic and troubleshooting activities related to voice calls. These tools help us monitor call patterns, detect anomalies, and investigate potential abuse to prevent illegal robocall traffic. All analytics performed with Google Cloud tools complement our internal monitoring and quality assurance processes.

Upstream Providers – We only use upstream voice providers that are STIR/SHAKEN compliant and that we have verified as listed in the FCC's Robocall Mitigation Database as STIR/SHAKEN compliant. Waitlist Me only allows calls to be placed from numbers provisioned and rented from voice service provider listed in the FCC's Robocall Mitigation Database and compliant with STIR/SHAKEN requirements. We periodically verify these providers' compliance statuses and maintain communication regarding any potential issues with illegal robocall traffic. The voice service providers that we partner with also have other tools and processes for monitoring for abuse and notifying us in such cases where corrective action is needed.