

The company originates outbound calls solely for its own business communications to existing customers located in the United States. All calls are manually placed by staff; no auto-dialers, predictive dialers, or automated messaging systems are used. The company does not provide voice services to third parties, does not resell telecommunications capacity, and does not originate traffic on behalf of unrelated entities.

The company routes all outbound calls through its upstream carriers — DIDWW, IDT Express, and Vonage. These providers perform STIR/SHAKEN caller ID authentication on behalf of the company in accordance with FCC requirements. The company does not directly implement STIR/SHAKEN.

The company shares common ownership with an affiliate located in Egypt. That affiliate makes calls only to U.S.-based customers of the company using the same upstream VoIP providers. Neither the company nor its affiliate resells telecom services or carries traffic for unrelated third parties.

To prevent unlawful robocalls, the company enforces the following mitigation practices:

- Calls are placed only to verified customers who have voluntarily provided their phone numbers.
- Internal Do-Not-Call requests are honored immediately.
- No lead lists are purchased or used.
- Call access is restricted to authorized personnel only.
- Call activity is monitored to detect and prevent abnormal patterns.

The company will respond to all traceback requests from the Industry Traceback Group or law enforcement within 24 hours. To the best of its knowledge, the company has not been subject to any FCC or law enforcement action related to robocalls or spoofing.