

Robocall Mitigation Program Description

Moff Technologies LLC

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1. Service Description and Call Types

Moff Technologies LLC provides limited application functionality that interacts with the public switched telephone network (PSTN) through a reputable, mass-market, U.S.-based telecommunications provider.

Our services are limited to:

1. **Inbound forwarded calls:** Users may configure conditional call forwarding with their native carrier to forward declined or unanswered calls to a direct inward dial (DID) number controlled by Moff Technologies LLC. We log call metadata and, where enabled, provide voicemail capture. The call is terminated within our system. We do not originate a new outbound PSTN leg as part of inbound forwarded call handling.
2. **Outbound test call:** The application includes a user-initiated “Test Call Me” feature. When an authenticated user affirmatively taps the button in the app, the system places a single outbound call **only** to the verified telephone number associated with that user’s account. The destination number cannot be changed by the user.

Moff Technologies LLC does not provide bulk outbound calling, automated or predictive dialing, prerecorded message delivery, programmable voice APIs, wholesale carrier services, gateway services, arbitrary destination dialing, or telephone numbers assigned to end users.

2. Measures to Prevent Illegal Robocall Origination

Moff Technologies LLC takes reasonable steps to prevent illegal robocall origination, including:

- Outbound PSTN origination is limited solely to the user-initiated “Test Call Me” feature described above.
- Outbound test calls may be placed only to the verified telephone number associated with the authenticated account; no other destinations are permitted.
- The outbound test call feature is **rate limited** and technically constrained to prevent high-volume or automated use.

- Our Terms of Service prohibit robocalling, spoofing, spam, and unlawful use of the service.

3. Know-Your-Customer Controls

- Users must verify control of their telephone number before forwarding or outbound test features are enabled.
- Telephony features are available only to authenticated users associated with a verified number.
- Moff Technologies LLC does not provide third-party access to its telephony infrastructure and does not accept call origination traffic from other voice service providers, intermediate providers, gateway providers, or wholesale customers.

4. Monitoring and Enforcement

Usage is monitored for anomalous behavior inconsistent with expected human interaction. Accounts exhibiting suspicious or abusive activity may be suspended or terminated.

Moff Technologies LLC does not use third-party robocall analytics vendors given the limited and constrained nature of outbound origination.

5. STIR/SHAKEN Posture

Moff Technologies LLC does not operate STIR/SHAKEN authentication infrastructure and does not hold a Secure Telephone Identity (SPC) token.

PSTN connectivity is obtained through a reputable, mass-market, U.S.-based telecommunications provider that is subject to FCC regulation and applicable STIR/SHAKEN requirements. Accordingly, Moff Technologies LLC files as a **Voice Service Provider without a STIR/SHAKEN implementation obligation.**

6. Traceback Commitment

Moff Technologies LLC commits to responding within **24 hours** to traceback requests from the FCC, law enforcement, or recognized industry traceback organizations and to cooperating fully in lawful investigations.

7. Enforcement History

Moff Technologies LLC (and any entity under common ownership or control) has not 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 or regulatory requirements.