

Nodable Labs Robocall Mitigation Plan

Nodable Labs is committed to complying with all applicable federal, state, and local laws and regulations, including the Telephone Consumer Protection Act (TCPA) and the FCC's Robocall Mitigation Database requirements.

Robocall Mitigation Strategies:

1. Strict Adherence to TCPA Compliance:

- **Prior Express Written Consent:** All outbound calls are made only to individuals who have provided explicit, prior written consent.
- **Do Not Call List Maintenance:** We maintain and regularly update our internal Do Not Call list to ensure compliance with federal and state regulations.
- **Time-of-Day Restrictions:** Outbound calls are made during reasonable hours, avoiding early morning or late-night calls. **We utilize zip code information to determine the correct local time zone for each call recipient, ensuring compliance with time-of-day restrictions regardless of area code.**
- **Caller ID Accuracy:** We ensure that accurate caller ID information is displayed for all outbound calls.
- **Robust Opt-Out Mechanism:** We provide a simple and effective opt-out mechanism for all recipients of our calls, which is clearly communicated at the beginning of each call.
- **Transparent AI Disclosure:** At the beginning of each call, our AI system clearly discloses that the caller is interacting with an automated voice assistant.

2. Advanced AI Technology and Quality Assurance:

- **AI-Powered Call Routing:** Our AI technology is designed to route calls efficiently and accurately, minimizing the risk of accidental or unwanted calls.
- **Quality Assurance Procedures:** We have implemented rigorous quality assurance procedures to monitor call quality, compliance, and customer satisfaction.
- **Continuous Improvement:** We continuously monitor and improve our systems to enhance call quality and compliance.

3. **Strict KYC Process and Customer Commitment:**

- **Know Your Customer (KYC) Verification:** Before initiating any business relationship, we conduct a thorough KYC process to verify the identity and compliance practices of our customers.
- **TCPA Compliance Agreement:** All customers are required to sign a written agreement committing to adhere to all applicable TCPA regulations and our specific guidelines.

4. **Third-Party Provider Due Diligence:**

- **Vendor Selection:** We carefully select and monitor our third-party providers to ensure they adhere to strict compliance standards.
- **Regular Audits:** We conduct regular audits of our third-party providers to assess their compliance with TCPA and other relevant regulations.

5. **Employee Training and Education:**

- **Regular Training:** All employees involved in outbound calling operations receive regular training on TCPA compliance, ethical calling practices, and the importance of customer privacy.
- **Code of Conduct:** We have a strict code of conduct that outlines expectations for ethical behavior and compliance with all applicable laws and regulations.

6. **Monitoring and Reporting:**

- **Call Monitoring:** We monitor outbound calls to ensure compliance with TCPA and other relevant regulations.
- **Regular Reporting:** We generate regular reports on call volume, compliance metrics, and customer feedback.

Response to FCC Exemption Question:

Nodable Labs is not exempt from compliance with the TCPA and related FCC regulations. However, as a provider of AI-powered voice solutions that utilizes pre-recorded or artificial voice technology, we fall under a specific set of rules and requirements.

Relevant Rule:

The primary rule governing our operations is Section 227(b)(1)(B) of the Telephone Consumer Protection Act (TCPA), which prohibits making any solicitation call to a residential telephone line using an artificial or prerecorded voice to deliver a message without the prior express consent of the called party, unless an exemption or exception applies.

Why This Rule Applies:

Nodable Labs utilizes AI-generated voices to conduct outbound calls on behalf of our clients. The FCC has explicitly stated that AI-generated voices, including voice cloning, fall under the

definition of "artificial or prerecorded voice" within the TCPA. Therefore, we are obligated to obtain prior express consent from call recipients before initiating any communication using our AI voice technology.

How Nodable Labs Complies:

- **Prior Express Written Consent:** We ensure that all outbound calls are made only to individuals who have provided explicit, prior written consent to receive communications, including those utilizing AI-generated voices.
- **Transparent AI Disclosure:** Our AI system clearly discloses to call recipients at the beginning of each call that they are interacting with an automated voice assistant.
- **Robust Opt-Out Mechanism:** We provide a simple and effective opt-out mechanism for all recipients of our calls, allowing them to easily revoke consent at any time.

Additional Considerations:

While not exempt from the TCPA, Nodable Labs operates as a "Voice Service Provider without a STIR/SHAKEN obligation" because we do not directly originate calls on our network. Instead, we provide AI voice solutions to our clients, who are responsible for initiating the calls and ensuring compliance with STIR/SHAKEN requirements.

Furthermore, Nodable Labs is committed to exceeding the minimum requirements of the TCPA by implementing a comprehensive robocall mitigation plan. This plan includes strict KYC procedures, customer compliance agreements, time-of-day restrictions based on zip codes, and ongoing monitoring and reporting to ensure responsible and ethical use of our AI voice technology.

Nodable Labs Public TCPA Compliance Policy

Nodable AI Solutions provides AI-powered voice technologies to businesses in the legal, insurance, and financial services sectors. This policy outlines our commitment to facilitating TCPA compliance and the responsibilities of our customers in using our technologies.

Regulatory Summary: The Telephone Consumer Protection Act (TCPA)

The Telephone Consumer Protection Act (TCPA), related Federal Communications Commission (FCC) regulations, and court interpretations protect consumers from specific types of telemarketing. Under the TCPA, "telemarketing" is defined as "the initiation of a telephone call or message for the purpose of encouraging the purchase or rental of, or investment in, property, goods, or services, which is transmitted to any person." (47 C.F.R. § 64.1200(f)(12))

The TCPA mandates that telemarketers:

- Maintain a Do Not Call Policy
- Provide a copy of the Policy to requesting consumers
- Only make calls between 8 a.m. and 9 p.m. (local time of the person being called)

- Only make calls and texts to numbers not on the National Do Not Call List
- Only make calls and texts to numbers not on the business' internal do not call list
- Restrict the use of automatic telephone dialer systems (ATDS) when calling cell phones
- Restrict the use of artificial or prerecorded voice recordings to consumers
- Identify the caller's name and location

Customer Responsibility for TCPA Compliance

Nodable AI Solutions provides powerful AI voice technologies to our customers. It is the responsibility of our customers to ensure that their use of our technologies complies with all applicable laws and regulations, including the TCPA. This includes, but is not limited to:

- Obtaining necessary consent from consumers before initiating contact
- Maintaining and adhering to Do Not Call lists
- Respecting calling time restrictions
- Providing proper identification during calls
- Ensuring all telemarketing practices align with TCPA requirements

Our customers are solely responsible for understanding and complying with all legal requirements related to their use of our AI voice technologies.

Nodable's Commitment to Facilitating TCPA Compliance

While the primary responsibility for TCPA compliance rests with our customers, Nodable is committed to supporting our customers' compliance efforts:

Compliant Workflows

We guarantee that our AI voice technology workflows are constructed in a TCPA-compliant manner. This includes:

- Not utilizing pre-recorded messages or series of pre-recorded scripts
- Using generative AI to support real-time, context-aware conversations
- Employing dialing systems that use reasonable algorithms and do not use sequential or random number generation prohibited under the TCPA

Guidance and Education

Nodable personnel will take every action necessary to guide customers to compliant uses of our AI technology. This includes:

- Providing educational resources on TCPA requirements
- Offering consultation on best practices for TCPA compliance
- Regular updates on any changes to TCPA regulations that may affect the use of our technology

Technical Support

We offer technical support to help customers implement our technology in a compliant manner, including assistance with:

- Integrating consent management systems
- Setting up time zone restrictions for outbound calls
- Implementing caller identification features

Customizable Features

Our technology includes customizable features to support compliance, such as:

- Do Not Call list integration
- Time zone management for outbound calls
- Consent tracking and management

Training and Compliance

All Nodable employees involved in customer support, sales, or product development receive regular training on TCPA requirements and our commitment to facilitating customer compliance.

Reporting Concerns

If you have concerns about how our technology may be used in compliance with TCPA, please contact our Compliance Office. We are committed to addressing any issues promptly and effectively.

Disclaimer

While Nodable AI Solutions is committed to providing TCPA-compliant technology and guidance, we cannot guarantee or be held responsible for our customers' compliance with TCPA or any other applicable laws and regulations. Customers are advised to seek independent legal counsel to ensure their use of our technology complies with all applicable laws.

We are committed to supporting our customers in their compliant use of our AI voice technologies while respecting consumer privacy and rights.