

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Company Name: Staffify AI

Service Type: Voice Service Provider

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1. EXECUTIVE SUMMARY

Staffify AI operates as a voice service provider delivering AI-powered voice communication services through our telecommunications partner, Telnyx. This document describes our comprehensive robocall mitigation program designed to prevent illegal robocalls and protect consumers from fraudulent and unwanted communications.

Our service facilitates legitimate business communications including AI-powered customer service agents, IVR (Interactive Voice Response) systems, and call queue management for businesses across multiple countries including the United States, Canada, Netherlands, and other international markets.

2. STIR/SHAKEN AUTHENTICATION IMPLEMENTATION

2.1 Authentication Technology

Staffify AI implements call authentication through our telecommunications partner, Telnyx, which provides:

- ****STIR/SHAKEN Protocol Implementation****: All calls originating through our platform are authenticated using the STIR/SHAKEN (Secure Telephone Identity Revisited / Signature-based Handling of Asserted information using toKENs) framework as required by FCC regulations
- ****Caller ID Authentication****: Digital signatures are applied to call metadata to verify the authenticity of caller identification information
- ****Certificate-Based Verification****: Utilizes industry-standard cryptographic certificates to sign and verify call authentication tokens
- ****Multi-Country Support****: Authentication standards are applied across all supported regions including US, Canada, and international destinations

2.2 Call Authentication Process

1. ****Origination****: When a call originates through our platform, call metadata including caller ID is collected
2. ****Signature Generation****: Telnyx applies a digital signature to the call using STIR/SHAKEN protocols
3. ****Attestation Level Assignment****: Calls receive appropriate attestation levels (A, B, or C) based on the relationship between the originating carrier and the calling party
4. ****Token Transmission****: Authentication tokens are transmitted with the call through the telephone network
5. ****Verification****: Receiving carriers can verify the authenticity of the call signature

2.3 Compliance Standards

- Full compliance with FCC 47 CFR § 64.6301 STIR/SHAKEN requirements
- Regular updates to authentication protocols as standards evolve
- Monitoring of authentication success rates and failure investigations

3. CALL FILTERING AND BLOCKING PRACTICES

3.1 Network-Level Filtering

Our platform implements multiple layers of call filtering to identify and block illegal robocalls:

Subscription Verification

- **Active Subscription Checks**: All incoming calls are verified against active subscription status before being connected
- **Real-time Authorization**: Calls to numbers without active subscriptions are automatically rejected with appropriate messaging
- **Account Status Monitoring**: Continuous monitoring of customer account status to prevent service abuse

Employee Status Verification

- **Active Employee Validation**: Calls are only connected to active, verified employee accounts
- **Inactive Account Blocking**: Calls to deactivated or suspended employee numbers are automatically rejected

3.2 Call Pattern Analysis

- **Volume Monitoring**: Tracking of call volumes per account to detect abnormal patterns indicative of robocall activity
- **Velocity Checks**: Monitoring call frequency to identify rapid-fire calling patterns associated with illegal robocalling
- **Duration Analysis**: Analysis of call duration patterns to identify automated calling behaviors
- **Geographic Pattern Detection**: Monitoring for suspicious geographic distribution of calls

3.3 Webhook Security & Verification

- **Webhook Authentication**: All inbound call events are authenticated using Telnyx webhook verification mechanisms
- **Event Idempotency**: Duplicate event prevention to avoid replay attacks and ensure accurate call processing
- **Secure Transport**: All call signaling uses HTTPS/TLS encrypted connections
- **Client State Validation**: Call metadata is validated against expected formats and values

3.4 IVR and Queue Management Controls

Our platform includes sophisticated IVR and call queue systems with robocall mitigation features:

- **DTMF Input Validation**: Interactive voice response systems require valid user input, which automated robocalls cannot easily provide
 - **Retry Limits**: Maximum retry attempts (default 2) prevent robocall systems from repeatedly attempting menu navigation
 - **Timeout Controls**: Configurable timeout periods (default 10 seconds) to disconnect unresponsive automated systems
 - **Call Recording**: All calls can be recorded for quality assurance and compliance review
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4. SUBSCRIBER TOOLS AND FEATURES

4.1 Call Management Controls

Staffify AI provides enterprise customers with comprehensive call management tools:

Concurrent Call Limits

- **Configurable Capacity**: Customers can set maximum concurrent call limits per employee/agent
- **Overflow Handling**: Multiple overflow options including queue, voicemail, and busy signals
- **Real-time Adjustment**: Ability to adjust call capacity settings in real-time

Call Queue Management

- **Advanced Queuing**: Callers can be placed in managed queues when capacity is reached
- **Queue Policies**: Configurable queue policies (balanced, priority-based)
- **Abandon Detection**: Automatic detection and logging of abandoned calls
- **Maximum Retry Limits**: Transfer attempt limits (default 5 attempts) to prevent indefinite queuing

Transfer and Routing Controls

- **Verified Transfer Destinations**: All transfer destinations must be pre-configured and verified
- **Transfer Queue Settings**: Configurable retry logic for failed transfer attempts
- **Call Bridging Verification**: Confirmation of successful call transfers before disconnecting

4.2 Analytics and Reporting

- **Call Detail Records**: Comprehensive logging of all call activity including:
 - Call duration (AI, transfer, and queue time tracked separately)
 - Call outcome and disposition
 - Caller identification
 - Call path and routing decisions
- **Real-time Dashboards**: Live monitoring of call activity and patterns
- **Historical Reporting**: Access to historical call data for pattern analysis and compliance review

4.3 Number Provisioning Controls

- **Address Verification**: Phone number provisioning requires verified business addresses for applicable jurisdictions
 - **Number Type Restrictions**: Different number types (local, toll-free, national) have appropriate verification requirements
 - **Country-Specific Compliance**: Adherence to local regulations for each supported country
 - **Business Verification**: Enhanced verification for business accounts in jurisdictions requiring it
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5. COMPLAINT HANDLING PROCEDURES

5.1 Complaint Submission Process

Staffify AI maintains multiple channels for receiving robocall complaints:

For End Users

- **Email Support**: complaints@staffifyai.com
- **Support Portal**: Available through our website at <https://staffifyai.com>
- **Customer Dashboard**: Direct complaint submission through customer portal
- **Phone Support**: Dedicated support line for urgent complaints

For Enterprise Customers

- **Account Management**: Direct access to account managers for immediate complaint handling
- **Dashboard Reporting**: Built-in reporting tools for tracking and managing complaints
- **API Access**: Programmatic access to complaint data and resolution status

5.2 Complaint Investigation Process

1. Receipt and Logging (Within 1 business day)

- All complaints are logged in our tracking system
- Automatic acknowledgment sent to complainant
- Unique tracking number assigned

1. Initial Assessment (Within 2 business days)

- Review of call detail records
- Verification of complaint details against system logs
- Identification of responsible customer account
- Classification of complaint severity

1. Investigation (Within 5 business days)

- Detailed analysis of call patterns
- Review of call recordings (if available)
- Assessment of potential policy violations
- Consultation with customer if needed

1. Resolution and Action (Within 10 business days)

- Determination of appropriate action
- Customer notification of findings
- Implementation of corrective measures if needed
- Documentation of resolution

5.3 Enforcement Actions

Based on the severity and nature of violations, we may take the following actions:

- **Warning**: First-time minor violations receive written warnings
- **Service Suspension**: Temporary suspension of service for repeated violations
- **Service Termination**: Permanent termination for serious or repeated violations
- **Law Enforcement Referral**: Referral to appropriate authorities for illegal activity
- **Number Revocation**: Release of phone numbers associated with violations

5.4 Response Timelines

- **Complaint Acknowledgment**: Within 1 business day
- **Initial Response**: Within 2 business days
- **Full Investigation Completion**: Within 10 business days
- **Urgent/High-Priority Complaints**: Within 24 hours

5.5 Record Retention

- All complaints are retained for a minimum of 2 years
- Associated call records retained for audit purposes
- Resolution documentation maintained for compliance review

6. MITIGATION NETWORK PRACTICES

6.1 Upstream Provider Monitoring

Staffify AI works closely with our telecommunications partner Telnyx to:

- **Provider Vetting**: Utilize only reputable, FCC-compliant telecommunications providers
- **Traffic Monitoring**: Monitor traffic patterns from upstream providers for anomalies
- **Blocked Source Lists**: Maintain and update lists of known robocall sources
- **Provider Performance Review**: Regular review of provider compliance and performance

6.2 Network-Level Protections

- **Rate Limiting**: Implementation of rate limits on call origination to prevent mass calling
- **Geographic Restrictions**: Ability to restrict calls to/from specific geographic regions
- **Time-Based Controls**: Support for time-of-day restrictions on calling
- **Call Volume Caps**: Per-account call volume limits to prevent abuse

6.3 Database and Logging

- **Comprehensive Call Logging**: All call events logged to secure database
- **Webhook Event Tracking**: Complete audit trail of all webhook events with idempotency checking
- **Failed Call Tracking**: Logging of rejected, blocked, and failed calls
- **Processed Webhooks Database**: Tracking of all processed webhook events to prevent replay attacks

6.4 Real-time Monitoring Systems

- **Active Call Monitoring**: Real-time tracking of active calls per employee/account
- **Concurrent Call Enforcement**: Database-level locking to prevent race conditions in concurrent call management
- **Queue Position Tracking**: Real-time monitoring of callers in queue
- **Abandoned Call Detection**: Immediate detection and logging of abandoned calls

7. PUBLIC EDUCATION EFFORTS

7.1 Customer Education

Staffify AI is committed to educating our customers about robocall threats:

Documentation and Resources

- **Knowledge Base**: Comprehensive articles about robocall prevention and compliance
- **Best Practices Guide**: Guidelines for legitimate business calling practices
- **Compliance Documentation**: Clear explanation of applicable regulations
- **API Documentation**: Technical documentation emphasizing security and compliance

Training and Support

- **Onboarding Training**: All new customers receive training on proper platform use
- **Compliance Briefings**: Regular updates on regulatory changes
- **Technical Support**: Dedicated support team for questions about compliance
- **Account Reviews**: Periodic review of account usage patterns with customers

7.2 End User Protection Information

For consumers receiving calls through our platform:

- **Legitimate Business Calls**: Clear identification that calls are from legitimate businesses using AI technology
- **Opt-Out Mechanisms**: Support for customer opt-out requests
- **Caller ID Accuracy**: Commitment to accurate caller ID presentation
- **Transparency**: Clear disclosure of AI-powered agents when applicable

7.3 Industry Collaboration

- **Industry Standards**: Active participation in industry working groups
- **Information Sharing**: Collaboration with other providers on threat intelligence
- **Regulatory Engagement**: Cooperation with FCC and state regulatory authorities
- **Technology Advancement**: Investment in emerging robocall mitigation technologies

8. CALL-BLOCKING TECHNOLOGY STANDARDS

8.1 Technology Stack

Staffify AI implements robocall blocking using:

Telnyx Platform Features

- **Call Control API**: Real-time call control and routing decisions
- **Webhook Events**: Event-driven architecture for immediate call handling
- **Media Streaming**: Secure WebSocket connections for real-time audio
- **Recording Capabilities**: Call recording for compliance and quality assurance

Platform-Specific Technologies

- **Node.js Backend**: High-performance call processing and routing
- **MySQL Database**: Secure storage of call records and configuration
- **WebSocket Services**: Real-time communication for media streaming
- **Connection Pooling**: Efficient database transaction management for concurrent operations

8.2 Technical Capabilities

Call Screening Mechanisms

- **Pre-Answer Screening**: Verification of subscription and employee status before call answer
- **Machine Detection**: Support for answering machine detection (AMD) to identify automated systems
- **DTMF Collection**: Digit collection to verify human interaction
- **Speech Detection**: AI-powered speech analysis to identify automated recordings

Blocking Capabilities

- **Instant Rejection**: Immediate call rejection for failed verification
- **Custom Reject Messages**: Configurable messages for blocked calls
- **Silent Blocking**: Option to reject without notification
- **Temporary Blocks**: Time-limited blocks for suspected robocallers

8.3 Performance Standards

- **Low Latency**: Call routing decisions made in milliseconds
- **High Availability**: 99.9% uptime target for call processing
- **Scalability**: System designed to handle high call volumes
- **Redundancy**: Multiple layers of redundancy for critical components

8.4 Standards Compliance

- **SIP Protocol**: Standard Session Initiation Protocol for call signaling
- **RTP/SRTP**: Real-time Transport Protocol with encryption support
- **TLS 1.2+**: Modern encryption for all data in transit
- **GDPR Compliance**: Data protection standards for European operations
- **SOC 2 Type II**: Infrastructure security compliance through Telnyx partnership

8.5 Technology Limitations

We acknowledge the following limitations of current technology:

- **Legitimate Call Risk**: Overly aggressive filtering may occasionally block legitimate calls
- **Evolving Threats**: Robocallers continuously develop new evasion techniques
- **International Challenges**: Varying standards across international jurisdictions
- **Spoofing Detection**: Perfect detection of sophisticated spoofing is not always possible

Our mitigation program balances security with service quality, continuously adapting to emerging threats while minimizing false positives.

9. PROGRAM REVIEW AND UPDATES

9.1 Continuous Improvement

- **Quarterly Reviews**: Comprehensive review of program effectiveness every quarter

- **Incident Analysis**: Analysis of all reported incidents and complaints
- **Technology Updates**: Regular updates to call filtering and blocking technologies
- **Regulatory Monitoring**: Continuous monitoring of regulatory changes

9.2 Performance Metrics

We track the following metrics to assess program effectiveness:

- **Complaint Rate**: Number of robocall complaints per 1,000 calls
- **Block Rate**: Percentage of calls blocked by filtering systems
- **False Positive Rate**: Legitimate calls incorrectly blocked
- **Resolution Time**: Average time to resolve complaints
- **Customer Satisfaction**: Satisfaction ratings from customers and end users

9.3 Annual Certification

Staffify AI commits to:

- **Annual Program Review**: Comprehensive annual review of the entire mitigation program
- **FCC Filings**: Timely updates to FCC Robocall Mitigation Database
- **Documentation Updates**: Regular updates to this document as program evolves
- **Certification Maintenance**: Maintenance of all required certifications and compliance filings

10. CONTACT INFORMATION

General Inquiries

- **Email**: support@staffifyai.com
- **Website**: <https://staffifyai.com>

Robocall Complaints

- **Email**: complaints@staffifyai.com
- **Subject Line**: Use "Robocall Complaint" for priority handling

Regulatory and Compliance

- **Email**: compliance@staffifyai.com
- **For Law Enforcement**: legalrequests@staffifyai.com

Emergency Contact

- **24/7 Support**: Available through customer dashboard
- **Critical Issues**: Escalate through account manager

Mailing Address

Staffify AI

[To be completed with official business address]

FCC Registration

- **Company Name**: Staffify AI
- **Service Type**: Voice Service Provider
- **Upstream Provider**: Telnyx LLC (FCC-compliant, STIR/SHAKEN certified)

11. CERTIFICATION

I hereby certify under penalty of perjury that I am authorized to represent Staffify AI, and that the information contained in this Robocall Mitigation Program Description is true, complete, and accurate.

Authorized Representative:

Name: _____

Title:

Signature:

Date:

APPENDIX A: SUPPORTED COUNTRIES AND REQUIREMENTS

Countries Currently Supported:

- United States (US)
- Canada (CA)
- Netherlands (NL)
- Germany (DE)
- Spain (ES)
- France (FR)
- Italy (IT)
- United Kingdom (GB)
- Belgium (BE)
- Australia (AU)

Verification Requirements by Country:

- **US/CA**: Minimal verification for local numbers
 - **European Countries**: Enhanced business verification and address requirements
 - **All Countries**: Compliance with local telecommunications regulations
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APPENDIX B: TECHNICAL SPECIFICATIONS

Call Processing Architecture:

- **Platform**: Node.js with Express framework
- **Database**: MySQL with connection pooling
- **Telecommunications Partner**: Telnyx LLC
- **Media Streaming**: WebSocket (WSS) protocol
- **Authentication**: STIR/SHAKEN via Telnyx
- **Encryption**: TLS 1.2+ for all connections

Security Features:

- Webhook signature verification
 - Database transaction locking for concurrency control
 - Event idempotency tracking
 - Secure credential management
 - Encrypted media streams
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DOCUMENT REVISION HISTORY

Version	Date	Changes	Author
1.0	November 20, 2025	Initial document creation	Staffify AI Compliance Team

END OF DOCUMENT

This document is subject to updates as our robocall mitigation program evolves and regulatory requirements change. The latest version is always available through our compliance portal.