

Robocall Mitigation Program of The AI Calls Company s.r.o.

1. Overview and Role in the Call Chain

The AI Calls Company s.r.o. provides cloud-based call center and communication software to business customers. Our service enables customers to make and receive telephone calls via web and desktop applications. We do not operate our own public switched telephone network (PSTN) or interconnection facilities. Instead, we obtain telephone numbers and underlying call origination and termination services from upstream carriers and, in some cases, allow customers to use telephone numbers they already control (“bring your own numbers”), which are also provisioned and carried by underlying carriers.

In the call chain, The AI Calls Company s.r.o. acts as an application-layer voice service provider without a STIR/SHAKEN implementation obligation. All signaling to and from the PSTN, and all STIR/SHAKEN authentication and verification, are performed by the underlying carriers on their networks.

2. Regulatory Status and STIR/SHAKEN Exemption

The STIR/SHAKEN implementation requirements in 47 CFR § 64.6301 apply to originating and terminating voice service providers that operate the IP-based networks used to place calls into, or receive calls from, the PSTN. The AI Calls Company s.r.o. does not own or control such a network and does not perform call origination or termination at the carrier/network level.

Instead, The AI Calls Company s.r.o. generates call signaling at the application layer and hands it off to one or more underlying carriers, which then originate and terminate the calls on their networks and are responsible for implementing STIR/SHAKEN in accordance with 47 CFR § 64.6301.

Because The AI Calls Company s.r.o. does not operate the underlying carrier network and does not have the technical ability to deploy STIR/SHAKEN at that level, it is exempt from the direct STIR/SHAKEN implementation obligation. Accordingly, The AI Calls Company s.r.o. certifies as a “Voice Service Provider without a STIR/SHAKEN obligation” and complies with 47 CFR § 64.6305(a) by operating the robocall mitigation program described below.

3. Know Your Customer (KYC) and Onboarding Controls

The AI Calls Company s.r.o. has implemented a customer due diligence process designed to prevent bad actors from using its platform to originate illegal robocalls or spoofed traffic:

- We collect and verify key business identity information during onboarding, including legal entity name, business address, contact details, and, where applicable, corporate registration information and tax identifiers.

- We review the customer's intended use cases for our service (e.g., support, sales, notifications) and prohibit certain high-risk or illegal use cases (such as unsolicited spam campaigns, spoofing, and other abusive calling patterns).
- We reserve the right to request additional information or documentation from prospective customers and to decline service where risk factors are identified.
- Our Terms of Service and Acceptable Use Policy explicitly prohibit illegal robocalling, caller ID spoofing with intent to defraud, cause harm, or wrongly obtain anything of value, and other unlawful or abusive calling behavior.

4. Ongoing Monitoring of Traffic and Abuse Detection

The AI Calls Company s.r.o. monitors customer activity and call traffic patterns for indicators of illegal or abusive calling, including:

- Unusual spikes in call volume over a short period of time.
- Abnormal answer rates, call durations, or high levels of call failures that may indicate problematic campaigns.
- Complaints received from called parties, customers, upstream carriers, or regulators indicating possible illegal robocalls or spoofing.

When our monitoring or a complaint suggests potential abuse:

- We promptly review relevant call records and account activity.
- We may contact the customer to request an explanation or additional information.
- Where appropriate, we may temporarily suspend specific numbers, restrict outbound calling, or suspend/terminate the customer's account in accordance with our Terms of Service and legal obligations.

5. Call Blocking, Suspension, and Account Termination

To prevent ongoing illegal robocall traffic, The AI Calls Company s.r.o. maintains clear internal procedures to:

- Immediately block specific telephone numbers or routes associated with suspected illegal or abusive traffic.

- Suspend outbound calling for an account pending investigation when we have a reasonable basis to believe the account is being used for illegal robocalls or spoofing.
- Terminate accounts engaged in illegal or prohibited calling activity, including repeated violations of our policies or failure to cooperate in addressing complaints.

We also cooperate with our upstream carriers if they identify problematic traffic originating from our platform and take appropriate steps to investigate and remediate such traffic.

6. Cooperation with Traceback and Regulatory Inquiries

The AI Calls Company s.r.o. commits to fully cooperate with traceback requests and regulatory inquiries related to suspected illegal robocalls:

- We respond to traceback requests from the Commission, law enforcement, and the designated industry traceback consortium within 24 hours or as otherwise required.
- We maintain and, when legally appropriate, provide relevant call detail records and account information to assist in identifying the source of suspected illegal traffic.
- We cooperate with our upstream carriers and other involved providers to help identify and stop illegal robocall campaigns that may transit our platform.

7. Caller ID Practices

The AI Calls Company s.r.o. requires customers to use caller ID numbers that they legitimately control or are authorized to use, whether those numbers are obtained through our platform or brought by the customer from another provider. We prohibit caller ID manipulation intended to defraud, cause harm, or wrongly obtain anything of value.

Where feasible, we encourage customers to use stable and accurate caller ID, and we support configuration practices that align with best practices for trustworthy caller identification.

8. Program Review and Continuous Improvement

The AI Calls Company s.r.o. periodically reviews and updates its robocall mitigation program to address evolving regulatory requirements, industry best practices, and observed patterns of abuse. This includes:

- Adjusting KYC procedures and onboarding checks.
- Enhancing monitoring rules and abuse-detection logic.

- Updating internal response and enforcement processes.
- Coordinating with upstream carriers and industry stakeholders to improve the overall effectiveness of robocall mitigation.

9. Conclusion

Although The AI Calls Company s.r.o. does not itself operate an underlying carrier network and therefore is exempt from the direct STIR/SHAKEN implementation obligations of 47 CFR § 64.6301, it recognizes its responsibility as a voice service provider to prevent illegal robocalls and spoofing. Through the controls described above, The AI Calls Company s.r.o. maintains a robocall mitigation program consistent with 47 CFR § 64.6305(a) and is committed to cooperating with the Commission, law enforcement, the industry traceback consortium, and its upstream carriers to detect, investigate, and stop illegal robocall traffic.