

ROBOCALL MITIGATION PROGRAM DESCRIPTION

FCC Robocall Mitigation Database Filing — PUBLIC VERSION

COMPANY INFORMATION

Company Name: Frost and Finish Studio

Owner/Officer: Austin Kassaros, Owner

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Filing Date: February 20, 2026

1. COMPANY OVERVIEW AND SERVICE DESCRIPTION

Frost and Finish Studio is an interconnected VoIP service provider operating as DialFlowPro, a SaaS-based power dialing platform designed exclusively for insurance professionals. The company provides voice termination services to end users who use the platform to make outbound calls to prospective insurance customers.

The fundamental architecture of the DialFlowPro platform makes illegal robocalling technically impossible. The platform is designed from the ground up to require 100% human presence and interaction at every stage of every call. Without active human involvement, the platform simply does not function. There is no pathway — technical or otherwise — by which the platform can originate, connect, or sustain a call without a live human agent actively operating it in real time.

2. ARCHITECTURAL IMPOSSIBILITY OF ROBOCALLING

The single most important fact in this mitigation plan is this: DialFlowPro cannot robocall. Not due to policy. Not due to terms of service. Due to architecture.

The following technical realities make robocalling impossible on this platform:

a) Human Initiation Required for Every Call

Every outbound call on the DialFlowPro platform must be manually initiated by a live human agent who is logged in, present, and actively operating the platform interface. The system has no capability to initiate calls autonomously, on a schedule, or without direct real-time human input.

b) No Automated Message Capability

The platform has no prerecorded message playback capability for outbound calls. There is no mechanism by which an automated or prerecorded voice message can be delivered to a called party. Every word spoken on every call comes from a live human being.

c) Call Cannot Proceed Without Live Agent

If a live agent disconnects, becomes inactive, or is otherwise not present during a call, the platform terminates the call. The system cannot sustain or complete a call without continuous active human presence. A call without a human is not a call — it is a non-event that the platform does not allow.

d) Manual Disposition Required to Continue

After each call, the platform requires manual human input to disposition the call and advance to the next. The dialer will not proceed to the next call without deliberate human action. An unattended machine cannot disposition a call. The workflow stops completely without human decision-making at every step.

e) No Batch or Scheduled Dialing Without Human

While the platform supports power dialing functionality that queues calls for efficiency, this queue only advances when a live agent is present and ready to take the next call. The dialer does not run unattended. If no agent is active, no calls are placed. Period.

f) No API or Programmatic Call Origination

The platform does not expose any interface — API, webhook, or otherwise — that would allow calls to be programmatically originated without a human agent operating the front-end interface. There is no technical pathway for automated call origination.

3. STIR/SHAKEN IMPLEMENTATION

All outbound calls originating on the DialFlowPro platform are signed using the STIR/SHAKEN framework through upstream carrier partners who hold valid SPC tokens and signing certificates. Call authentication attestation is applied to all calls originating on our network. Frost and Finish Studio is in the process of obtaining its own SPC token and certificate through the STI-GA for full independent implementation.

4. RESPONSE TO TRACEBACK REQUESTS

Frost and Finish Studio commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement agencies, and the industry traceback consortium (USTelecom's Industry Traceback Group). The company will:

- Maintain complete call detail records (CDRs) for all calls transiting our network for a minimum of 24 months
- Designate a primary point of contact for all traceback and law enforcement requests
- Cooperate fully with any investigations into call traffic originating on our network

- Immediately suspend any account identified as a source of illegal call traffic pending investigation

5. UPSTREAM PROVIDER VERIFICATION

Frost and Finish Studio only routes traffic through providers registered in the FCC Robocall Mitigation Database. The company periodically verifies the RMD status of all upstream providers and will cease accepting traffic from any provider removed from the database.

6. SUMMARY

Frost and Finish Studio's robocall mitigation program is built on a simple and verifiable foundation: the DialFlowPro platform is architecturally incapable of robocalling. Every call requires a live human. Every call requires active human operation. Without a human, nothing works. This is not a policy — it is a technical reality baked into the design of the platform at every level. No terms of service, no monitoring program, and no after-the-fact enforcement mechanism provides stronger protection against illegal robocalling than a platform that simply cannot do it.

7. CERTIFICATION

I, Austin Kassaros, Owner of Frost and Finish Studio, hereby certify that the information contained in this Robocall Mitigation Program Description is true and accurate to the best of my knowledge. I further certify that Frost and Finish Studio has implemented and will continue to maintain the robocall mitigation measures described herein in compliance with 47 CFR § 64.6305(a) and all applicable FCC rules and orders.

Signature: Austin Kassaros

Title: Owner

Company: Frost and Finish Studio

Date: February 20, 2026

Public Version — Contact information redacted. For inquiries contact Frost and Finish Studio at 905 Atlantic Dr, West Chicago, IL 60185.