

Joyride Labs, Inc. ("Joyride Labs") submits this Robocall Mitigation Plan in compliance with 47 C.F.R. § 64.6305(d)(2)(ii)–(iii) for inclusion in the FCC Robocall Mitigation Database.

Joyride Labs is a non-facilities-based interconnected VoIP provider that provides telephony services to businesses in the automotive industry, including but not limited to dealerships, auto repair shops, and tire shops. Joyride Labs originates outbound voice traffic through its upstream carrier partner, Telnyx LLC. Joyride Labs does not operate its own transmission facilities.

## **1. STIR/SHAKEN Implementation**

Joyride Labs routes all outbound voice traffic through its upstream provider, Telnyx LLC. Telnyx implements STIR/SHAKEN authentication in accordance with FCC rules and industry standards.

Joyride Labs does not directly sign calls. However:

- All outbound voice traffic is routed through Telnyx LLC, which represents that it implements STIR/SHAKEN authentication in accordance with FCC requirements.
- Joyride Labs verifies customer identity prior to service activation.
- Joyride Labs assigns and manages telephone numbers through authorized carrier channels.
- Customers may also port existing telephone numbers with verified authorization.
- Customers are not permitted to transmit calls using unauthorized or spoofed caller ID information.

## **2. Know Your Customer (KYC) Practices**

Joyride Labs employs identity and business verification controls prior to enabling outbound voice capabilities in compliance with 47 C.F.R. § 64.1200(n)(4).

### **Manual Customer Onboarding**

All customers are onboarded through a manual process during which Joyride Labs verifies that each prospective customer operates a legitimate automotive business (e.g., dealership, auto repair shop, or tire shop).

### **10DLC Brand Registration**

As part of the onboarding and 10DLC brand registration process, Joyride Labs collects and verifies the following information for each customer:

- Legal company name
- Employer Identification Number (EIN)
- Business address
- Business contact details

Customers are required to use only telephone numbers that are either assigned by Joyride Labs or properly ported with verified authorization.

### **3. Voice Traffic Monitoring and Analytics**

Joyride Labs employs monitoring systems to detect patterns consistent with illegal robocalling or other abusive activity.

#### **Monitored Metrics**

Joyride Labs monitors for, among other indicators:

- Outbound call and text volume anomalies
- Call duration patterns
- High call velocity
- Traffic patterns inconsistent with customer profile or use case

Joyride Labs does not currently use any third-party analytics vendors to identify or block illegal traffic. All monitoring is performed using internal systems and tools.

#### **Enforcement Actions**

Accounts that exceed internal risk thresholds or exhibit suspicious activity may be:

- Flagged for review
- Rate-limited
- Temporarily suspended
- Permanently suspended or terminated

### **4. Acceptable Use Enforcement**

Joyride Labs' Terms of Service prohibit:

- Prerecorded voice calls in violation of law
- Use of automated dialing systems in violation of the TCPA
- Any unlawful telemarketing activity
- Scams, impersonation, or fraudulent schemes

Joyride Labs reserves the right to impose usage limits, block outbound traffic, suspend accounts, or terminate service without notice when required to comply with carrier or regulatory obligations.

### **5. Prior Regulatory Actions**

Neither Joyride Labs, Inc. nor any entity with which it shares common ownership, management, directors, or control has been the subject of any formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing related to the transmission, encouragement, assistance, or facilitation of illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description, within the prior two years.

### **6. Complaint Monitoring and Traceback Cooperation**

Joyride Labs commits to:

- Responding fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.

- Cooperating with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
- Taking immediate mitigation action when credible evidence of illegal robocalling is identified, including traffic suspension, account termination, preservation of relevant records, and cooperation with enforcement authorities.

## **7. Upstream Carrier Coordination**

Joyride Labs' upstream voice provider is Telnyx LLC.

Joyride Labs cooperates with Telnyx and other industry partners to:

- Investigate suspected illegal robocall traffic
- Identify originating customers
- Enforce carrier-level requirements
- Comply with mitigation directives

Joyride Labs honors carrier-imposed restrictions when necessary to prevent illegal traffic from propagating.

## **8. Ongoing Evaluation and Improvement**

Joyride Labs continuously evaluates:

- Effectiveness of traffic monitoring thresholds and controls
- Emerging robocall tactics and fraud vectors
- Regulatory guidance updates
- Industry best practices

Joyride Labs updates its controls and mitigation strategies as necessary to reduce the risk of illegal robocall origination.