

Robocall Mitigation Program

PropCloser Inc.

Effective Date: April 7, 2026

1. Company Overview

PropCloser Inc. is a technology company that provides an AI-powered Transaction Coordinator (TC) platform for real estate professionals. The platform facilitates administrative coordination of real estate transactions, including sending text messages, emails, and voice calls to transaction parties (buyers, sellers, agents, title companies, and lenders) on behalf of its subscribers.

PropCloser Inc. originates voice communications exclusively through Telnyx, Inc., a certified STIR/SHAKEN-compliant carrier. PropCloser does not operate its own telecommunications network or switching infrastructure.

2. STIR/SHAKEN Exemption

PropCloser Inc. is exempt from the STIR/SHAKEN implementation requirement under 47 CFR § 64.6301(b) because it does not operate as a facilities-based voice service provider. All outbound voice calls originated by the PropCloser platform are transmitted through Telnyx, which performs STIR/SHAKEN call authentication and signing on PropCloser's behalf.

As a non-facilities-based provider, PropCloser is not required to implement STIR/SHAKEN directly but maintains the robocall mitigation program described herein, consistent with 47 CFR § 64.6305(a).

3. Robocall Mitigation Practices

PropCloser Inc. has implemented the following reasonable steps to avoid originating illegal robocall traffic:

3.1 Know Your Customer (KYC) Verification

All subscribers must complete an onboarding process that collects and verifies:

- Legal business name or full legal name (for sole proprietors)
- Employer Identification Number (EIN) or personal identification
- Business address
- Contact information

This information is validated against carrier registration requirements before any voice or messaging services are activated for the subscriber.

3.2 10DLC Campaign Registration

Each subscriber is individually registered with the Campaign Registry through Telnyx under the 10DLC (10-Digit Long Code) framework. This ensures:

- Each subscriber's identity is verified by the carrier network
- Messaging campaigns are approved before any texts are sent
- All outbound communications are tied to a verified, registered entity

3.3 Content Controls

The PropCloser platform restricts outbound communications to legitimate real estate transaction coordination. All messages are:

- Generated by the AI Transaction Coordinator for documented real estate deals
- Limited to transaction status updates, scheduling, document requests, and closing coordination
- Subject to opt-out compliance (STOP/HELP/START auto-responses)
- Logged and auditable

3.4 Prohibited Use Enforcement

PropCloser's Terms of Service (<https://propcloser.ai/terms>) explicitly prohibit subscribers from using the platform to:

- Originate or facilitate illegal robocalls
- Send unsolicited marketing or spam messages
- Spoof caller ID information
- Engage in any fraudulent communication practices

Violation of these terms results in immediate suspension and termination of the subscriber's account and associated phone number.

4. Traceback Cooperation

PropCloser Inc. commits to cooperating fully and within 24 hours with all traceback requests from:

- The Federal Communications Commission (FCC)
- Law enforcement agencies
- The Industry Traceback Group (ITG)

PropCloser will provide all requested call detail records, subscriber information, and platform logs to assist in identifying and stopping any illegal robocall activity that may originate through its platform.

5. Contact Information

For traceback requests or compliance inquiries:

PropCloser Inc.

Attn: Antonio Edwards, CEO

Email: support@propcloser.ai

Website: <https://propcloser.ai>

6. Certification

I, Antonio Edwards, CEO and Founder of PropCloser Inc., certify that the information contained in this Robocall Mitigation Program description is true and accurate, and that PropCloser Inc. is committed to preventing illegal robocall traffic from originating through its platform.