

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Filed Pursuant to 47 CFR § 64.6305

Date: April 10, 2026

1. Company Information

Company Name: ALERTSIO LLC

DBA: CallFlow (callflow.solutions)

FCC Registration Number (FRN): 0038282331

Role in Call Chain: Voice Service Provider – Originating Provider

Contact: support@callflow.solutions

2. STIR/SHAKEN Implementation Status

ALERTSIO LLC has partially implemented the STIR/SHAKEN caller ID authentication framework. As a cloud-based voice application platform, CallFlow routes inbound and outbound calls through upstream wholesale SIP carriers, including BulkVS and Ahoi, which maintain their own STIR/SHAKEN signing infrastructure and certifications. CallFlow does not directly control the originating SIP gateway at the carrier interconnect level and therefore does not independently sign all originated calls under its own STIR/SHAKEN certificate authority. Full STIR/SHAKEN implementation is not technically feasible under the current non-facilities-based architecture, consistent with the exemption provided under 47 CFR § 64.6304(b)(1). CallFlow continues to evaluate a path toward full implementation as its infrastructure evolves.

3. Robocall Mitigation Program – Reasonable Steps

3.1 Customer Identity Verification (Know Your Customer)

CallFlow requires all customers to provide verified business or personal identity information prior to account activation, including legal name, company name, business address, and contact information. New accounts are reviewed for legitimacy before being granted access to voice services. Customers must agree to CallFlow's Acceptable Use Policy, which expressly prohibits the use of the platform for robocalling, spoofing, or any illegal call activity.

3.2 Know Your Upstream Provider Program

CallFlow maintains relationships exclusively with reputable, known wholesale SIP carriers. All upstream providers are vetted for compliance with FCC regulations, including their own RMD registration status, STIR/SHAKEN implementation, and industry standing. CallFlow does not accept traffic from unknown or unregistered intermediate providers.

3.3 Real-Time Traffic Monitoring and Rate Limiting

CallFlow's platform includes built-in real-time call traffic monitoring. Automated rate limiting is enforced at the campaign and account level to prevent high-volume automated dialing patterns consistent with robocalling. Concurrent call caps and daily call volume limits are enforced per customer account and per destination number.

3.4 Call Analytics and Spam Shield

CallFlow operates a multi-layer anti-fraud system referred to internally as "Spam Shield," which includes the following components:

- Integration with known robocaller and spam number blocklists
- STIR/SHAKEN attestation level monitoring on inbound call traffic

- Automated detection of suspicious calling patterns (rapid repeat calls, sequential dialing)
- Automatic blocking of repeat offenders
- VoIP origin detection to flag high-risk call sources

3.5 Measures to Prevent Customers from Originating Illegal Robocalls

CallFlow actively monitors customer traffic for patterns consistent with illegal robocalling, including unusually high call volumes, sequential number dialing, and short-duration call patterns. Upon detection of such activity, CallFlow's administrative team is empowered to immediately suspend or terminate the offending customer's account and block further traffic. CallFlow maintains an administrative override tool enabling instant blocking of any number, campaign, or account.

3.6 Response to Traceback Requests

ALERTSIO LLC commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement agencies, and the USTelecom Industry Traceback Group (ITG). CallFlow maintains detailed call logs including originating caller ID, destination number, timestamps, and upstream carrier information sufficient to support traceback investigations. Logs are retained for a minimum of 12 months.

3.7 Cooperation with Authorities

ALERTSIO LLC commits to cooperating with the FCC, law enforcement, and the industry traceback consortium in all investigations related to illegal robocalls or caller ID spoofing originating from or passing through its network. CallFlow will take immediate corrective action upon notification of confirmed illegal robocall activity on its platform.

4. Ongoing Compliance

ALERTSIO LLC will update this Robocall Mitigation Program Description as required by the FCC and will update its RMD filing within 10 business days of any material changes to its mitigation program or company information. ALERTSIO LLC is committed to achieving full STIR/SHAKEN implementation as the company's infrastructure and carrier relationships develop.

5. Officer Certification

I, the undersigned officer of ALERTSIO LLC, certify under penalty of perjury that the information contained in this Robocall Mitigation Program Description is true and correct to the best of my knowledge, information, and belief.

DIGITALLY SIGNED

Rohit Chauhan

Signed: April 10, 2026

Name: Rohit Chauhan

Title: CEO, ALERTSIO LLC

Date: April 10, 2026

Company: ALERTSIO LLC (d/b/a CallFlow)

FRN: 0038282331