

OVERVIEW AND PURPOSE

PeakSend AI LLC ("PeakSend") is a voice AI platform that originates outbound calls on behalf of business customers. All calls are placed to leads who have affirmatively opted in to receive contact from the applicable customer. PeakSend does not transmit unsolicited marketing calls, political calls, or calls to consumers who have not provided prior express written consent.

This Robocall Mitigation Program is established pursuant to 47 CFR Section 64.6305 and describes the reasonable steps PeakSend takes to prevent origination of illegal robocall traffic.

STIR/SHAKEN IMPLEMENTATION

PeakSend's upstream voice carriers provide STIR/SHAKEN A-level attestation on all outbound calls originated by PeakSend. A attestation reflects that PeakSend is the direct originator of the call and that the calling number is assigned to PeakSend. PeakSend verifies that its upstream carriers maintain current STIR/SHAKEN compliance as part of its provider vetting process described below.

CALLER ID AND NUMBER ASSIGNMENT

PeakSend owns and controls all outbound calling numbers. Customers do not select, provide, or influence which number is used for any given call. Number assignment is handled entirely by PeakSend's platform. Because customers have no access to number configuration, caller ID spoofing is architecturally impossible.

For customers operating at low call volume, outbound calls are placed from PeakSend's shared number pool. For high-volume customers, PeakSend provisions CNAM records displaying that customer's business name. In all cases, the calling number is a PeakSend-owned number that accurately identifies the originating platform.

CUSTOMER ONBOARDING AND KNOW-YOUR-CUSTOMER PROCEDURES

Customer Identification

PeakSend collects identifying information from all customers at signup. Self-serve customers provide a verified email address and billing name and address via payment processor at the time of first purchase. Enterprise customers additionally provide their legal business name and physical address prior to account activation.

Opt-In Lead Requirement

Customers are contractually prohibited from uploading contact lists that do not consist of leads who have given prior express written consent to be contacted by or on behalf of that customer, as required by 47 CFR 64.1200(a)(2). Customers must attest to this requirement during onboarding and agree to it in PeakSend's Terms of Service. Customers bear full contractual liability for misrepresentations regarding the consent status of their contact lists.

PeakSend monitors call answer rates and conversion rates as ongoing signals of list quality. Answer rates below 10% or conversion rates below 5% on a per-customer basis trigger an internal compliance review. PeakSend also tracks consumer opt-out and complaint rates per customer; elevated rates trigger a compliance review and may result in account suspension or termination.

Script Review

All call scripts submitted by customers undergo manual review by PeakSend staff before activation. PeakSend's current call volume is low enough that staff maintain direct familiarity with each active customer's scripts and calling activity. Reviews assess the accuracy of required disclosures (business identity, purpose of call, opt-out mechanism), the absence of deceptive or fraudulent content, and compliance with applicable FTC and FCC regulations. Scripts containing deceptive language, false claims, or prohibited content are rejected.

TRAFFIC MONITORING

PeakSend monitors per-customer and platform-wide call answer rates on an ongoing basis. Given PeakSend's current call volume, staff have direct per-customer familiarity that enables reliable anomaly detection. PeakSend reviews call recordings and transcripts on a sample and complaint-triggered basis to verify that live call content matches the approved script and that agents are operating in compliance with applicable law.

Consumer opt-out requests are recorded and the requesting contact is permanently suppressed from all future calls across PeakSend's platform.

UPSTREAM PROVIDER VETTING

PeakSend routes calls through voice carriers and intermediaries that are listed and in good standing in the FCC Robocall Mitigation Database. Before accepting service from any new upstream or downstream provider, PeakSend confirms that provider's current database registration status.

RESPONSE TO TRACEBACK REQUESTS AND INVESTIGATIONS

PeakSend commits to responding within 24 hours to traceback requests from the FCC, federal or state law enforcement agencies, and the Industry Traceback Group or its successor. PeakSend will cooperate fully with investigations into potentially illegal robocall traffic and will

take prompt action, including account suspension or termination, upon credible evidence of violation.

Upon identifying or receiving credible notice of illegal robocall activity originating from a customer account, PeakSend will immediately suspend the implicated traffic pending investigation, notify the customer in writing of the alleged violation, conduct an internal review of call records, scripts, and contact lists, cooperate with any law enforcement or regulatory inquiry, and permanently terminate the account if the violation is substantiated.

COMPLIANCE RESPONSIBILITY

PeakSend's leadership team shares joint responsibility for this Program. Either member of the team may be contacted for compliance inquiries, traceback requests, or regulatory correspondence at the contact information on file with the FCC Robocall Mitigation Database.

PROGRAM MAINTENANCE

This Program will be reviewed and updated at least annually, and within 10 business days of any material change to PeakSend's calling practices, network configuration, or upstream provider relationships. PeakSend will actively re-file this Program with the FCC Robocall Mitigation Database on or before March 1 of each calendar year, as required by 47 CFR Section 64.6305.