

# Robocall Mitigation Program Description

*Filed pursuant to 47 C.F.R. § 64.6305 with the Federal Communications Commission*

## 1. Filer Information

**Legal Name:** Roamless Technologies Inc.

**Doing Business As:** Roamless

**FRN:** 0038426904

**State of Incorporation:** Delaware, USA

**Business Address:** 1401 Pennsylvania Ave, Unit 105, Wilmington, DE 19806

**Filing Category:** Voice Service Provider

**Service Type:** Retail consumer eSIM and mobile connectivity services, including the provision of US telephone numbers to individual end users for personal communication purposes.

## 2. Overview of Services

Roamless is a global eSIM provider offering data, voice, and SMS connectivity to individual consumers primarily while travelling internationally. As part of its retail consumer offering, Roamless provides US telephone numbers to end users on a per-subscriber basis. These numbers are sold exclusively to individual retail customers through the Roamless mobile application for personal communication use. Roamless does not provide voice services for bulk outbound calling, automated dialling, telemarketing, or any wholesale or carrier-of-carriers function.

All underlying voice and number provisioning is delivered through Roamless's upstream wholesale supplier(s), which hold the underlying numbering resources and perform call routing and signalling. Roamless's role is limited to retail customer acquisition, provisioning, billing, and customer support.

## 3. STIR/SHAKEN Implementation

Roamless does not directly originate or terminate calls on the Public Switched Telephone Network and therefore does not independently sign calls with a STIR/SHAKEN attestation. All outbound calls placed by Roamless end users using US numbers are originated and signed by Roamless's upstream wholesale voice provider, which is itself an RMD-listed and STIR/SHAKEN-compliant US voice service provider.

Roamless has implemented a complete robocall mitigation program (described below) as the operative compliance mechanism for the calls associated with the numbers it administers, consistent with 47 C.F.R. § 64.6305(b).

## 4. Robocall Mitigation Practices

## **4.1 Know-Your-Customer (KYC)**

Roamless provisions US telephone numbers only to verified end users of the Roamless consumer application. Each customer account is established through the following verification controls:

- Email address verification at sign-up via one-time confirmation link or code.
- Payment verification through a regulated payment processor, which provides an independent identity signal (cardholder name, billing address, fraud scoring).
- Device-level fingerprinting and IP address logging at account creation and at each session, supporting downstream abuse detection.
- Acceptance of Roamless Terms of Service, which expressly prohibit use of Roamless services for illegal robocalling, telemarketing without consent, caller ID spoofing, or any activity that violates the Telephone Consumer Protection Act (TCPA) or FCC rules.

## **4.2 Service Restrictions**

Roamless's service architecture limits the risk of illegal robocall activity by design:

- US numbers are provisioned on a number-per-account basis to individual consumer accounts; bulk provisioning is not available through the Roamless application.
- The Roamless application is a consumer-facing mobile app and does not expose APIs that would enable automated outbound dialling or programmatic call origination.
- Roamless does not offer Calling Line Identification (CLI) customisation or caller ID modification features that would enable spoofing.

## **4.3 Traffic Monitoring**

Roamless and its upstream voice supplier jointly monitor traffic patterns associated with Roamless-provisioned US numbers for indicators of robocall activity, including but not limited to:

- Abnormally high outbound call volumes per number relative to a consumer baseline.
- Short-duration call patterns characteristic of automated dialling.
- High Average Call Attempts to Completion (ACA) ratios.
- Calls to known honeypot numbers or numbers on Do-Not-Originate lists.
- Sudden changes in calling patterns inconsistent with a single retail consumer.

Where suspicious patterns are detected, Roamless investigates promptly and, where warranted, suspends or terminates the offending account and reclaims the associated number.

## **4.4 Traceback Response**

Roamless maintains a dedicated traceback response process and a monitored point of contact (see Section 6 below). Roamless commits to:

- Acknowledge traceback requests from the Industry Traceback Group (ITG), the FCC, the FTC, law enforcement, or any other recognised traceback consortium within 2 business days of receipt.
- Provide subscriber-level information (consistent with applicable privacy law) and call records associated with traced calls within the timeframe requested.
- Cooperate fully with any subsequent investigation, including providing logs, KYC records, and evidence of action taken against offending subscribers.

#### **4.5 Enforcement Against Offending Subscribers**

Where Roamless identifies or is notified of a subscriber transmitting or facilitating illegal robocalls, Roamless takes graduated action:

- Immediate suspension of outbound calling capability for the implicated number(s) pending investigation, in cases of credible evidence.
- Permanent termination of the offending account and reclamation of the associated US numbers where wrongdoing is confirmed.
- Blocking of associated payment instruments, devices, and account identifiers from re-registration.
- Reporting of confirmed criminal robocall activity to relevant authorities where appropriate.

#### **4.6 Upstream Supplier Diligence**

Roamless contracts only with US voice and numbering suppliers that are themselves listed in the FCC Robocall Mitigation Database, are STIR/SHAKEN-compliant, and that contractually commit to robocall mitigation obligations. Roamless reviews its supplier compliance status periodically and reserves the right to terminate suppliers found to be non-compliant.

### **5. Governance and Review**

Responsibility for the operation and ongoing review of this Robocall Mitigation Program sits with Roamless's Carrier Relations function, reporting to the Chief Operating Officer. The program is reviewed at least annually and updated as required to reflect changes in FCC rules, supplier arrangements, Roamless's service offering, or observed threat patterns. Material changes are filed with the RMD within 10 business days as required by 47 C.F.R. § 64.6305(b)(4).

### **6. Designated Point of Contact for Robocall Mitigation**

**Name:** Ali Gazioglu

**Title:** Chief Operating Officer

**Department:** Carrier Relations

**Email:** ali@roamless.com

**Telephone:** +1 (415) 481-4900

This contact monitors a shared inbox during business hours and on-call rotation, and is the point of escalation for all traceback requests, FCC enquiries, and regulatory correspondence related to Roamless's robocall mitigation obligations.

## **7. Certification**

The undersigned, an authorised officer of the filing entity, certifies under penalty of perjury that the foregoing description of Roamless's robocall mitigation program is accurate and complete as of the date below, and that Roamless has implemented the practices described herein. The filing entity undertakes to update this filing within 10 business days of any material change pursuant to 47 C.F.R. § 64.6305(b)(4).

**Signed:**  \_\_\_\_\_

**Name:** Ali Gazioglu

**Title:** Chief Operating Officer

**Date:** 16 May 2026