

Robocall Mitigation Program Description

FreeCallMe

Date: May 27, 2026

Prepared by: John Patino, Founder

Website: freecallme.com

1. Company Overview

FreeCallMe is a browser-based communication platform that enables users to make free voice and video calls directly from their web browser without downloading any application. FreeCallMe also provides VoIP calling functionality allowing users to call standard telephone numbers from their browser. FreeCallMe operates as a sole proprietorship owned and operated by John Patino.

2. STIR/SHAKEN Implementation Status and Basis for Non-Implementation (47 CFR § 64.6304)

FreeCallMe has not yet fully implemented the STIR/SHAKEN authentication framework. FreeCallMe is a small, newly established voice service provider that does not have direct control over the network infrastructure necessary to independently implement STIR/SHAKEN. FreeCallMe relies on its upstream provider, SignalWire, Inc., for STIR/SHAKEN implementation and call authentication. FreeCallMe has formally submitted a STIR/SHAKEN attestation request to SignalWire and is actively pursuing Level A attestation. Full STIR/SHAKEN implementation is pending approval from SignalWire's compliance team. FreeCallMe commits to completing this implementation as expeditiously as possible upon approval.

3. Specific Reasonable Steps to Avoid Originating Illegal Robocall Traffic (47 CFR § 64.6305(a))

(a) Know Your Customer Obligations (47 CFR § 64.1200(n)(4)):

FreeCallMe verifies the identity of all users prior to enabling outbound VoIP calling capabilities. Users are required to create an authenticated account with a verified email address. FreeCallMe collects and retains customer information including name, email address, and account creation date. FreeCallMe does not permit anonymous or unverified

users to originate outbound calls to standard telephone numbers. All customers agree to FreeCallMe's Terms of Service, which explicitly prohibit illegal robocalling, spoofing, and spam calling.

(b) Know Your Upstream Providers:

FreeCallMe uses a single upstream voice service provider: SignalWire, Inc., located at 228 Hamilton Ave., 3rd Floor, Palo Alto, CA 94301. SignalWire is a licensed voice service provider that maintains its own robocall mitigation program and STIR/SHAKEN implementation. FreeCallMe has verified SignalWire's legitimacy and compliance posture prior to entering into a service agreement.

(c) Analytics and Traffic Monitoring:

FreeCallMe monitors outbound call volumes on a per-user basis using internal logging and analytics. Accounts exhibiting call patterns consistent with automated dialing, unusually high call volumes, or other anomalous behavior are flagged for manual review and may be suspended pending investigation. FreeCallMe does not currently use a third-party analytics vendor for robocall detection but monitors call logs directly. FreeCallMe does not provide automated dialing capabilities, predictive dialers, or any functionality enabling mass automated calling. All calls are manually initiated by individual end users.

(d) Terms of Service Enforcement:

FreeCallMe's Terms of Service explicitly prohibit use of the platform for robocalling, spam calling, caller ID spoofing, or any other illegal calling activity. Violations result in immediate account termination and preservation of relevant records for law enforcement purposes.

(e) Call Log Retention:

FreeCallMe maintains outbound call logs for a minimum of 18 months to support traceback investigations and law enforcement requests.

4. Traceback Cooperation Commitment (47 CFR § 64.6305(a))

FreeCallMe commits to responding fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement agencies, and the industry traceback consortium (USTelecom). FreeCallMe will cooperate fully with all investigations into illegal robocall activity originating from its platform and will take immediate action to identify, block, and report any traffic identified as illegal.

5. Prior Commission, Law Enforcement, or Regulatory Agency Actions or Investigations

FreeCallMe certifies that neither FreeCallMe nor John Patino (owner), nor any entity sharing common ownership, management, directors, or control with FreeCallMe, has at any time in the prior two years been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Certification

I certify that the information provided in this Robocall Mitigation Program Description is accurate and complete. FreeCallMe is committed to complying with all applicable FCC rules and regulations regarding robocall mitigation, including 47 CFR § 64.6305, and will update this program description as necessary to reflect changes in its operations or compliance status.

John Patino

Founder, FreeCallMe

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