

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Filer: Lojiq AI LLC

FRN: 0038433702

DBA: Lojiq

Parent Company: ClearVoice AI LLC

Filing Date: June 3, 2026

NOTE: This is the non-confidential (redacted) version of the Robocall Mitigation Program Description. Certain contact information has been redacted in this version. An unredacted version has been filed separately with the Commission.

1. Company Overview

Lojiq AI LLC ("Lojiq") operates an AI-powered voice agent platform that enables regulated industry businesses to conduct outbound voice communications with their consenting consumers. Lojiq's customers are primarily mortgage lenders, cannabis dispensaries, and legal services providers who hold existing consumer relationships and pre-existing express consent to communicate with the consumers being called.

Lojiq AI LLC is a wholly-owned subsidiary of ClearVoice AI LLC.

Current monthly call volume is between 500,000 and 1,000,000 calls per month, distributed across approximately 10 active customer organizations.

Lojiq AI LLC originates calls through upstream voice service providers that implement STIR/SHAKEN call authentication at the carrier level. Lojiq does not directly sign calls with its own certificates and does not operate IP-based voice network infrastructure subject to STIR/SHAKEN implementation obligations under 47 CFR § 64.6301.

2. Customer Onboarding and Screening

Before any customer is permitted to originate calls through the Lojiq platform, the following onboarding requirements must be satisfied:

2.1 KYC Verification

Lojiq verifies the legal identity of each prospective customer organization, including:

- Verification of Employer Identification Number (EIN)
- Verification of business legal name, registered address, and operational status
- Identification of the principal authorized to bind the organization

2.2 Onboarding Call

Each prospective customer must complete an onboarding call with Lojiq during which Lojiq reviews:

- The customer's intended use case for outbound communications

- The source of the customer's lead lists and the consent basis for those leads
- The customer's compliance posture, including their own DNC scrubbing practices
- Required disclosures and compliance obligations under federal and applicable state law

2.3 Customer Rejection

Lojiq actively rejects prospective customers when compliance concerns are identified during onboarding, including but not limited to:

- Inability to demonstrate proper consent for outbound communications
- Inability to articulate a TCPA-compliant use case
- Use cases that fall outside Lojiq's permitted vertical scope

2.4 Phone Number Provisioning and Registration

All caller ID numbers (DIDs) used by Lojiq customers are provisioned through Lojiq's upstream voice service providers and registered to the customer's verified legal entity. Customers cannot bring their own numbers or spoof caller ID, as caller ID is controlled entirely by Lojiq's platform infrastructure.

3. Consent Verification and Customer Obligations

3.1 Terms of Service Acceptance

At account creation, every customer must accept Lojiq's Terms of Service, which include explicit representations that the customer has obtained the required consent to conduct outbound AI-powered communications with the consumers in their uploaded lead lists.

3.2 Campaign Activation Acknowledgment

At the point of activating any outbound calling campaign, customers must again acknowledge their consent obligations through an in-platform notice that reiterates the consent requirements before any dials are placed.

3.3 Customer Scrubbing Obligations

Customers are instructed and required to scrub their lead lists against the following databases prior to upload:

- The Federal Do-Not-Call Registry
- The TCPA Litigator List (commercial litigator scrubbing database)

4. Lojiq Platform-Level Scrubbing

In addition to customer-side scrubbing, Lojiq applies the following scrubbing at the platform level before any outbound dial is placed:

4.1 Federal Do-Not-Call Registry

Lojiq scrubs all outbound dial attempts against the Federal Do-Not-Call Registry.

4.2 TCPA Litigator List

Lojiq scrubs all outbound dial attempts against the TCPA Litigator List to prevent calls to known TCPA plaintiffs and litigators.

4.3 Reassigned Numbers Database

Lojiq scrubs all outbound dial attempts against the FCC's Reassigned Numbers Database to prevent calls to consumers who may have inherited a previously-consented phone number.

4.4 Internal Do-Not-Call Registry

Lojiq maintains a comprehensive internal Do-Not-Call list that captures opt-out requests from all communication channels:

- Voice opt-outs detected by AI agents during conversations
- SMS STOP responses
- Manual additions submitted by customer compliance teams
- Consent revocations from any other channel

All outbound dial attempts are scrubbed against this internal DNC list at the time of dial. Opt-outs are honored immediately upon receipt — Lojiq's processing exceeds the FCC's 10-business-day requirement.

5. 1:1 Dialing Architecture and Abandonment Rate

Lojiq operates a structurally 1:1 dialing architecture. Every outbound dial has a dedicated AI agent instance attached at the time of dial, ensuring that no call is ever placed without an agent available to engage the called party.

This architecture structurally eliminates the abandoned-call risk that predictive dialers create under the FCC's 3% abandonment rule (47 CFR § 64.1200(a)(7)). Lojiq's measured abandonment rate is 0.000%.

6. AI Disclosure for Applicable Jurisdictions

Lojiq's AI agents include AI disclosure language at the start of outbound calls to consumers in states with applicable AI disclosure requirements. AI disclosure logic is automated based on the dialed state and applied per applicable state law.

7. Call Recording and Retention

All outbound calls are recorded in accordance with applicable state law. For two-party consent jurisdictions (California, Florida, Washington, and others), recording disclosures are made consistent with state requirements before recording commences.

Call recordings are retained indefinitely for compliance audit purposes and to support traceback investigations.

8. Compliance Monitoring

Lojiq operates a comprehensive compliance monitoring program that includes:

- Automated detection of compliance-relevant events during calls
- Human review of flagged calls and customer activity

- Regular monitoring of customer call patterns for indicators of compliance concerns
- Investigation and remediation of any identified compliance issues

9. Traceback Cooperation

Lojiq commits to responding fully and within 24 hours to traceback requests from:

- The Federal Communications Commission
- Law enforcement agencies
- The Industry Traceback Group (ITG)
- Upstream voice service providers

Lojiq will fully cooperate with such entities in investigating and stopping any illegal robocallers that may attempt to use Lojiq's service to originate calls.

10. Designated Compliance Contact

Name: Rani Brikho

Title: Founder & CEO

Email: [REDACTED]

Phone: [REDACTED]

Address: 901 Tower Dr, Troy, MI 48098

The designated compliance contact will respond to traceback requests, regulatory inquiries, and law enforcement requests within 24 hours of receipt.

11. Ongoing Compliance Commitment

Lojiq AI LLC certifies that:

- It has not had any prior FCC certification removed by Commission action
- It has not been prohibited from filing in the Robocall Mitigation Database by the Commission
- It commits to maintaining and continuously improving its robocall mitigation practices in accordance with 47 CFR § 64.6305(a)

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