

Robocall Mitigation Program Description

Company Overview

Legal Name: Zcalo, Inc.

FRN: 0038498150

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Business Description

Our company operates as a customer reactivation service provider. We work with businesses across multiple industries to reconnect with previously opted-in customers who have become inactive.

Robocall Mitigation Program

We have implemented a comprehensive robocall mitigation program designed to prevent the origination of unlawful robocalls and ensure full compliance with all applicable federal and state telecommunications laws, including the Telephone Consumer Protection Act (TCPA) and FCC regulations.

Network and Call Authentication Practices

All voice traffic is routed through telecommunications providers that support STIR/SHAKEN call authentication protocols. By utilizing providers that are compliant with industry call authentication standards, we help ensure the integrity and transparency of outbound caller identification.

Consent Verification and Data Controls

We require all clients to confirm and document that contacts included in any campaign have provided prior express consent to receive communications. Our internal compliance procedures include:

- Verification that contact lists originate from the client's own opted-in customer database.
- Review of campaign use cases prior to launch.
- Prohibition on the use of purchased, scraped, or third-party customer lists without documented consent.
- Maintenance of opt-out mechanisms in all applicable communications.

Customer Vetting

Before onboarding any client, we conduct due diligence to validate legitimacy and intended use of services. This includes:

- Business identity verification.

- Review of the client's industry and business model.
- Confirmation that intended campaigns align with FCC, FTC, and TCPA compliance standards.

Contractual Compliance Requirements

All clients are required to enter into a binding service agreement that explicitly prohibits:

- Use of our platform for unlawful robocalls or spam.
- Misrepresentation, fraud, or deceptive marketing practices.
- Violations of federal or state telecommunications laws.

Any violation may result in immediate suspension or permanent termination of services.

Traffic Monitoring and Enforcement

We actively monitor campaign activity for abnormal patterns, including unusual call volume spikes or suspicious behavior. Any flagged activity is promptly investigated, and campaigns may be paused pending review.

We fully cooperate with traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Group (ITG) as required.

Caller ID Transparency

We ensure that all outbound caller ID information accurately represents the originating business and is not misleading or deceptive. Caller identification practices follow FCC guidance and industry best practices.

Compliance Contact

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