

Robocall Mitigation Program Description

Submitted to the Federal Communications Commission — Robocall Mitigation Database
Pursuant to 47 CFR § 64.6305(a)

Filing Entity	Blackbox AI Apps Ltd
Business Address	71-75 Shelton Street, Covent Garden, London, WC2H 9JQ, United Kingdom
Provider Type	Voice Service Provider (Reseller) — without a STIR/SHAKEN obligation
Foreign Voice Service Provider	Yes (United Kingdom)
Robocall Mitigation Contact	Ugur Usta, Founder
Contact Email	admin@blackboxaiapps.com
Contact Telephone	+90 546 966 5397
Upstream Carrier	Telnyx LLC

1. Company Overview and Role in the Call Chain

Blackbox AI Apps Ltd (“Blackbox” or “the Company”) operates a mobile application that provides second-phone-number services to end users. The Company resells voice origination services obtained from its upstream carrier, Telnyx LLC, and does not own, operate, or control any portion of the underlying network infrastructure used to originate, route, or terminate calls. Blackbox prominently identifies Telnyx as its underlying carrier within the application (displayed as “Powered by Telnyx” on the application splash screen and in its app store listings).

As a pure reseller without control over the network infrastructure necessary to implement the STIR/SHAKEN caller ID authentication framework, Blackbox is exempt from the STIR/SHAKEN implementation requirement pursuant to 47 CFR § 64.6305(d)(2)(i). All STIR/SHAKEN call authentication for traffic originated through the Company’s service is performed by Telnyx. Notwithstanding this exemption, Blackbox maintains the robocall mitigation program described herein, consistent with 47 CFR § 64.6305(a), and takes reasonable steps to avoid the origination of illegal robocall traffic on its service.

2. Reasonable Steps to Avoid Originating Illegal Robocall Traffic

Blackbox has implemented a comprehensive “Know Your Customer” (KYC) and abuse-prevention program. The Company has implemented and tested all KYC measures recommended by its upstream carrier, Telnyx, and applied them within its application. These reasonable steps include the following:

- **Identity and contact verification.** New users are subject to email and SMS/phone-number verification at the point of registration, ensuring that each account is associated with a verifiable contact.

- **Payment verification.** Users are subject to payment-method validation, which provides an additional layer of identity assurance and discourages anonymous, disposable, or fraudulent account creation.
- **Usage limits and rate controls.** Per-user calling-volume limits and rate controls are enforced to detect and prevent patterns consistent with high-volume automated or illegal robocalling.
- **Automated abuse and spam detection.** Automated monitoring is in place to identify suspicious calling patterns, spam indicators, and behavior inconsistent with legitimate person-to-person communication.
- **Enforcement and account suspension.** Accounts found to be engaged in, or reasonably suspected of, originating illegal robocalls, spoofing, or other prohibited activity are promptly suspended or terminated.
- **Acceptable-use and terms-of-service restrictions.** The Company's terms of service expressly prohibit the use of its service to originate illegal robocalls, unlawful spoofing, or any other unlawful calling activity, and reserve the right to suspend or terminate violating accounts.

3. Commitment to Traceback Requests and Cooperation

Blackbox commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (ITG). The Company further commits to cooperate with such entities in identifying, investigating, and stopping any illegal robocallers that may use its service to originate calls, including by providing relevant subscriber and call-detail information as permitted by applicable law and by taking prompt mitigating action against offending accounts.

Traceback requests and other robocall-related inquiries should be directed to the robocall mitigation contact identified above: Ugur Usta, Founder, admin@blackboxaiapps.com, +90 546 966 5397.

4. Certification

Blackbox certifies that all of the calls that it originates on its service are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a). The Company certifies that it has not had any prior certification removed by Commission action and that it has not been prohibited from filing in the Robocall Mitigation Database by the Commission. Because Blackbox does not control the network infrastructure necessary to implement STIR/SHAKEN, it has not implemented the STIR/SHAKEN authentication framework on any portion of its service and relies on its upstream carrier, Telnyx, for caller ID authentication.

This Robocall Mitigation Program Description is submitted in connection with Blackbox AI Apps Ltd's filing in the FCC Robocall Mitigation Database and is true and accurate to the best of the filer's knowledge.

Ugur Usta, Founder
Blackbox AI Apps Ltd