

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Creatixdial LLC

FCC Registration Number (FRN): 0038552709

Employer Identification Number (EIN): 30-1496609

Business Address: 30 N Gould St Ste N, Sheridan, WY 82801, United States

Date: July 4, 2026

1. Overview and Provider Role

Creatixdial LLC (the "Company") operates a hosted, multi-tenant contact-center software platform that provides outbound calling (dialer) infrastructure to independent business customers. Each customer operates on a dedicated, isolated server instance with its own carrier connection and its own provisioned telephone numbers. The Company does not operate a facilities-based telephone network and does not perform call-authentication signing; all originated traffic is carried by the Company's underlying communications carriers, each of which performs STIR/SHAKEN caller-ID authentication on its own network.

This robocall mitigation program is submitted pursuant to 47 CFR § 64.6305(a) and describes the specific, reasonable steps the Company takes to avoid originating illegal robocall traffic.

2. STIR/SHAKEN Status

The Company is a non-facilities-based reseller of voice services. It holds no Service Provider Code (SPC) token or STIR/SHAKEN signing certificate of its own, obtains all telephone numbers from its underlying carriers, and does not control the carrier networks over which its traffic is originated to the public switched telephone network. Providers that lack control over the network infrastructure necessary to implement STIR/SHAKEN are exempt from the implementation requirement (First Caller ID Authentication Report and Order, 35 FCC Rcd 3241, 3260, para. 40), and 47 CFR § 64.6305(d)(2)(i) permits certification on that basis. The Company has therefore certified "No STIR/SHAKEN Implementation" (Option 3) in its Robocall Mitigation Database filing.

All calls originated through the platform are transmitted via the Company's underlying carriers, each of which is registered in the FCC's Robocall Mitigation Database and authenticates calls under the STIR/SHAKEN framework on its own network. The Company verifies each underlying carrier's Robocall Mitigation Database registration and STIR/SHAKEN participation before routing traffic through it, and maintains a current internal register of all carriers in use. Because customers may originate calls only from telephone numbers legitimately provisioned to them through the platform, originated calls are eligible for full ("A") attestation by the originating carrier.

3. Robocall Mitigation Practices

The Company enforces the following controls platform-wide. These controls are enforced by the platform itself and cannot be disabled, bypassed, or overridden by customers:

3.1 Customer verification (KYC/KYB). Every customer must complete identity and business verification before any calling capability is activated. The Company collects and retains business registration details, a government-issued identity document for the authorized signer, and a signed acceptable-use and TCPA / Do-Not-Call attestation.

3.2 Caller-identification integrity. Customers may transmit caller ID only from telephone numbers provisioned to their own account and connection. Caller-ID spoofing, third-party caller ID, and use of

numbers not assigned to the customer are technically prevented by the platform.

3.3 Responsible number usage. The quantity of telephone numbers a customer may provision is capped in proportion to the customer's licensed agent count. The platform prohibits number warehousing, parking, and rotation patterns ("snowshoeing") intended to evade spam, answer-rate, or reputation controls. Local-presence assignment is constrained to a capped pool per campaign; indiscriminate rotation across large number blocks is disabled.

3.4 Daily volume limits. Per-number and per-customer daily call-volume limits are enforced to prevent abusive calling patterns.

3.5 Abandoned-call controls. Predictive dialing is configured so that the abandoned-call rate does not exceed three percent (3%), consistent with the Telemarketing Sales Rule. A compliant recorded identification message is played on any abandoned call.

3.6 Do-Not-Call suppression and opt-out. Every campaign is subject to automatic Do-Not-Call suppression against the customer's internal suppression list, which incorporates every opt-out and Do-Not-Call request received on any prior call placed through the platform. Opt-out and Do-Not-Call requests are recorded and honored automatically, and the requesting number is suppressed from further contact. Customers are contractually required to comply with all applicable federal and state Do-Not-Call requirements for their calling programs, including scrubbing against the National Do-Not-Call Registry where required, and attest to that compliance as part of the acceptable-use and TCPA / Do-Not-Call attestation described in Section 3.1.

3.7 Calling-hours restriction. Outbound calling is restricted to 9:00 a.m. through 9:00 p.m. in the called party's local time, determined from the called number, consistent with federal calling-time rules.

3.8 Consent and lawful basis. Customers must attest to a lawful basis (such as prior express consent or an applicable exemption) for each uploaded calling list, identifying the source, date, and basis of consent. Lists submitted without a consent attestation are blocked from being dialed. Records are retained for the applicable statutory period.

3.9 Call-recording disclosure. A recording disclosure is provided at the start of calls where recording is enabled.

3.10 Restricted customer administration. Customer-level administrative access is restricted so that customers cannot disable, bypass, or weaken any control described in this program, including caller-ID integrity, number caps, calling-hour windows, abandoned-call limits, and Do-Not-Call suppression.

4. Traceback Cooperation

The Company commits to respond fully and within twenty-four (24) hours to all traceback requests from the Federal Communications Commission, law enforcement, and the Industry Traceback Group, and to cooperate with such entities in identifying and stopping any illegal robocaller that may attempt to use the platform. The Company maintains records sufficient to identify the originating customer for any call placed through the platform, and will suspend or terminate any customer found to be originating illegal traffic.

5. Designated Point of Contact

Robocall Mitigation Contact: Mahmoud Elhadad, Managing Member

Email: info@creatixdial.com

Telephone: +1 914-535-5885

Address: 30 N Gould St Ste N, Sheridan, WY 82801, United States

6. Certification

The Company certifies that all calls it originates are subject to the robocall mitigation program described above; that this program includes reasonable steps to avoid originating illegal robocall traffic; that the Company commits to respond fully and within 24 hours to all traceback requests; and that no prior certification of the Company has been removed by Commission action, nor has the Company been prohibited from filing in the Robocall Mitigation Database by the Commission.