

Robocall Mitigation Program Description

Filer: Milo Intelligence LLC

FCC Registration Number: 0038632899

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1. Provider identification and service description

Legal name	Milo Intelligence LLC
Business address	1603 Capitol Ave, Ste 415 No 920796, Cheyenne, WY 82001
RMD contact	Nicolas Dooman, Member, Compliance, admin@zapr.ai, 310-307-9994
Provider role	Voice Service Provider without a STIR/SHAKEN implementation obligation
Foreign voice service provider	No
Operating Company Number	No OCN

Milo Intelligence LLC provides a software-enabled outbound calling platform for business customers, including insurance agents and similar sales or customer-contact teams. Milo's platform enables authorized users to place outbound PSTN calls using telephone numbers provisioned, assigned, or verified for use with the service. Milo does not permit anonymous calling, spoofed caller ID, or calling from numbers that are not authorized for the customer or campaign.

2. STIR/SHAKEN status and upstream authentication path

Milo does not currently operate its own STIR/SHAKEN authentication service, does not currently hold or use its own SPC token or STI certificate for call signing, and does not inject its own SIP Identity header into outbound INVITEs. Milo's production outbound calling path is intended to route through BulkVS as Milo's upstream SIP/carrier provider. BulkVS performs carrier-side STIR/SHAKEN signing and attestation for outbound calls sent through the BulkVS platform, using BulkVS's applicable STIR/SHAKEN framework and certificate.

Milo's current RMD certification is therefore being updated from Complete STIR/SHAKEN Implementation to No STIR/SHAKEN Implementation - Performing Robocall Mitigation. Milo will not represent that it signs calls using its own STIR/SHAKEN certificate unless and until it obtains the required SPC token/certificate or otherwise implements a compliant authentication arrangement under applicable FCC rules.

- Outbound calls must use caller ID numbers provisioned, assigned, or verified for the Milo customer and calling campaign.
- Milo will route production outbound PSTN calls through BulkVS or another upstream provider that supports compliant caller ID authentication and robocall mitigation requirements.

- Milo will coordinate with BulkVS or any future upstream provider so that outbound calls are handled under the appropriate carrier-side STIR/SHAKEN and attestation process when technically available.
- Milo will keep internal records of number assignments, customer identity review, campaign/use-case review, and upstream provider configuration sufficient to investigate traceback and complaint matters.

3. Basis for no own STIR/SHAKEN implementation

Milo is not currently operating carrier authentication infrastructure or its own STI-AS. Milo relies on its upstream SIP/carrier provider for PSTN interconnection and carrier-side STIR/SHAKEN signing/attestation. Milo's robocall mitigation controls focus on customer identity review, caller ID authorization, campaign controls, monitoring, complaint response, and cooperation with BulkVS, downstream carriers, the FCC, law enforcement, and traceback entities.

4. Customer onboarding and Know Your Customer controls

Milo will implement reasonable Know Your Customer procedures before permitting production outbound calling. These procedures include:

- Collecting business identity information for each customer, including legal name, contact information, website or business presence when available, and authorized administrator information.
- Reviewing the customer's calling use case, including industry, campaign purpose, expected call volumes, target recipients, and whether the traffic involves sales, lead follow-up, appointment setting, customer service, or other permitted uses.
- Requiring customers to agree to terms prohibiting illegal robocalls, spoofing, fraudulent calls, calls to consumers without required consent, and calling practices that violate the Telephone Consumer Protection Act, Telemarketing Sales Rule, state calling rules, Do Not Call requirements, or other applicable law.
- Requiring customers to maintain appropriate consent, lead-source, opt-out, and Do Not Call suppression records for their campaigns.
- Restricting or rejecting customers, use cases, campaigns, or lead sources that present elevated illegal robocall, fraud, spoofing, or traceback risk.

5. Caller ID and number controls

- Milo will permit outbound caller ID only from numbers assigned to or verified for the customer/campaign within Milo's platform and upstream carrier account configuration.
- Milo will not permit customers to freely enter arbitrary caller ID values.
- Milo will maintain records showing which customer and campaign used each outbound caller ID number during relevant time periods.
- If Milo receives evidence that a number is being misused, mislabeled, spoofed, or associated with illegal robocall activity, Milo will investigate and may suspend the number, campaign, customer account, or outbound calling privileges.

6. Traffic monitoring and abuse prevention

Milo will monitor calling activity for indicators of illegal robocalling, spoofing, fraud, or consumer harm. Monitoring may include:

- Unusual call-volume spikes, short-duration call bursts, high answer-abandon patterns, repeated failed calls, or traffic patterns inconsistent with the approved use case.
- Complaint, traceback, spam-labeling, carrier-notification, or BulkVS notification signals.
- Use of unapproved caller IDs, changes in campaign purpose, suspicious destination patterns, or customer attempts to bypass platform controls.
- Manual review of accounts or campaigns flagged by automated thresholds, support complaints, traceback requests, or upstream-provider alerts.

Milo may throttle, suspend, or terminate traffic and customer access when suspicious or noncompliant activity is detected.

7. Traceback, law enforcement, and FCC cooperation

Milo commits to respond fully and within 24 hours to traceback requests from the FCC, law enforcement, the Industry Traceback Group, and other authorized traceback entities. Milo will cooperate with BulkVS, downstream carriers, the FCC, law enforcement, and traceback entities to investigate and stop illegal robocall traffic that may use or attempt to use Milo's service.

The designated robocall mitigation contact is Nicolas Dooman, admin@zapr.ai, 310-307-9994. Milo will maintain current contact information in the Robocall Mitigation Database and will update the filing within required timeframes if any material information changes.

8. Enforcement and remediation

Milo's remediation measures may include customer outreach, campaign review, requiring supporting consent or number-authorization records, disabling a campaign or caller ID, throttling traffic, suspending or terminating an account, notifying BulkVS or other upstream providers, and preserving records for investigation. Milo will not knowingly allow customers to continue using the service to originate illegal robocalls, spoofed calls, or traffic that violates Milo's terms or applicable law.

9. Recordkeeping and ongoing review

Milo will maintain records reasonably necessary to support robocall mitigation, including customer identity information, approved use cases, number assignments, caller ID configuration, complaints, traceback requests, investigation outcomes, and account enforcement actions. Milo will periodically review its mitigation controls and update this program as needed based on operational experience, carrier requirements, FCC requirements, BulkVS requirements, and changes in Milo's services.

This program description is submitted for Milo Intelligence LLC's Robocall Mitigation Database filing and describes Milo's planned and operational controls for production outbound PSTN calling.