

# Robocall Mitigation Program Description

RMD Compliance-Focused Report

## Company and Filing Overview

|                |                                                                                     |
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| Legal Name     | ZYFYO LLC                                                                           |
| DBA / Platform | CallMyBusiness.ai                                                                   |
| FRN            | 0038644522                                                                          |
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| RMD Scope | This document is intentionally limited to robocall mitigation compliance. It is not a marketing brochure, product roadmap, pricing document, or general business plan. |
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## 1. Purpose and Scope

This Robocall Mitigation Program Description is limited to ZYFYO LLC's robocall mitigation practices for RMD compliance. It describes the controls used to prevent, detect, investigate, and stop illegal robocalls, spoofing, scam traffic, fraudulent calling, and unauthorized telemarketing in connection with ZYFYO-supported voice services.

## 2. Provider Role and STIR/SHAKEN Status

ZYFYO LLC is a non-facilities-based VoIP reseller and business communications provider. ZYFYO does not currently operate its own voice switching network, telephone-numbering resources, STIR/SHAKEN certificate, or STIR/SHAKEN signing infrastructure. ZYFYO's customer traffic may be carried through approved upstream telecommunications provider infrastructure, including VoIP.ms, Twilio, Telnyx, and/or other qualified carriers or service providers. Where applicable, ZYFYO expects technical STIR/SHAKEN signing and call attestation to be performed by the upstream provider carrying the traffic. ZYFYO will not represent that it has a complete or partial STIR/SHAKEN implementation unless and until ZYFYO directly implements such capability or obtains formal confirmation that a hosted implementation applies to its traffic.

## 3. Services Covered by this Program

This program applies to customer-facing VoIP reseller services, business phone numbers, SIP credentials, IP softphone access, SIP device access, IP desk phone configurations, business call routing, and AI-assisted business communication features when used with voice traffic. The program is focused on lawful customer communications and does not authorize illegal robocalls, spoofing, scam traffic, unauthorized telemarketing, or abusive outbound campaigns.

## 4. Customer Verification / KYC

ZYFYO verifies customers before enabling VoIP, SIP credentials, IP softphone access, outbound calling, caller ID use, or SMS-related communications. Verification may include the customer's legal business name, DBA or brand name, business registration details where available, physical or service address, website or public business listing, authorized representative name and title, business email, business phone, intended use case, expected call/message volume, and documentation confirming authorization to use relevant telephone numbers. Higher-risk accounts may require government-issued identification for the authorized representative, business registration documents, proof of number ownership or authorization, sample scripts, and documentation of consent practices.

## 5. Risk-Based Review and Re-Verification

ZYFYO applies a risk-based review process. Low-risk customers may include local businesses using inbound AI receptionist or ordinary business phone functions. Medium-risk customers may include customers using outbound appointment reminders, SMS follow-up, or multiple SIP devices. High-risk customers may include high-volume outbound users, lead generation, debt collection, financial services, warranty-related calling, international outbound traffic, or any account with suspicious patterns. ZYFYO may re-verify customers when red flags appear, including sudden call-volume spikes, complaints, traceback requests, repeated failed calls, unusual destination patterns, caller ID irregularities, or suspicious SIP/device activity.

## 6. Number Authorization and Caller ID Controls

Customers may only use telephone numbers assigned by ZYFYO's approved providers or numbers they own, control, or are authorized to use. ZYFYO may require proof of number ownership or authorization, such as a phone bill, letter of authorization, provider record, or other documentation. ZYFYO prohibits misleading caller ID, unauthorized number use, and spoofing.

## 7. Prohibited Traffic and Acceptable Use

ZYFYO prohibits use of its services for illegal robocalls, caller ID spoofing, scam traffic, fraudulent calling, harassment, unauthorized telemarketing, mass unsolicited calling, evasion of call-blocking systems, or continued calling/message activity after opt-out or do-not-call requests. Customers must comply with applicable call consent, telemarketing, privacy, SMS, call recording, and consumer protection laws.

## 8. Monitoring, Analytics, and Red Flags

ZYFYO uses the analytics, monitoring features, provider dashboards, call detail records, call logs, complaint reports, SIP/device activity records, and platform usage data made available by its approved upstream telecommunications providers, including VoIP.ms, Twilio, Telnyx, and/or other qualified providers. ZYFYO does not currently use a separate third-party call analytics vendor. If ZYFYO later adopts a separate third-party call analytics vendor, ZYFYO will update its RMD filing and mitigation program description as required. Red flags include unusual call-volume spikes, high short-duration call ratios, repeated failed calls, unusual destination patterns, excessive outbound activity, complaints, traceback requests, caller ID irregularities, and suspicious SIP credential activity.

## 9. Traceback and Complaint Response

ZYFYO will respond fully and within 24 hours to valid traceback requests from the FCC, law enforcement, the Industry Traceback Group, upstream providers, or other authorized entities. ZYFYO will investigate relevant customer accounts, call records, customer verification records, SIP/device activity, and caller ID use. ZYFYO will cooperate with upstream providers and authorized entities to identify, mitigate, and stop illegal traffic.

## 10. Suspension, Termination, and Remediation

ZYFYO may restrict outbound calling, disable caller ID, suspend SIP credentials, disable IP softphone or SIP device access, block traffic, require re-verification, or terminate customer accounts when suspicious activity, complaints, traceback requests, policy violations, fraud indicators, or illegal traffic are identified. ZYFYO may also decline service to customers that present unacceptable robocall, spoofing, fraud, or telemarketing risk.

## 11. Know Your Upstream Provider / KYUP

ZYFYO will conduct reasonable due diligence on approved upstream telecommunications providers before using them for customer traffic. This includes checking the provider's status in the FCC Robocall Mitigation Database, reviewing the provider's STIR/SHAKEN and robocall mitigation status, maintaining current abuse and compliance contacts, and confirming procedures for traceback, complaint handling, and traffic suspension. ZYFYO will not knowingly route customer traffic through an upstream provider that is deficient, de-listed, or otherwise not in good standing where such status affects lawful traffic acceptance.

## 12. Record Retention

ZYFYO will maintain customer verification records, authorized representative information, service address information, number authorization records, consent-related documentation where applicable, complaint records, traceback records, investigation notes, and suspension or termination records for at least four years after the end of the customer relationship, where legally permissible.

## 13. Ongoing Compliance and Updates

ZYFYO will review and update its RMD filing and mitigation program description when material information changes, including changes to company contact information, business address, upstream providers, business model, STIR/SHAKEN status, call analytics vendors, or robocall mitigation practices. ZYFYO will complete required annual RMD recertification by the applicable FCC deadline and will maintain an internal compliance calendar for RMD review, recertification, and material update tracking.

## 14. Certification Statement

ZYFYO LLC is committed to taking reasonable and effective steps to prevent, detect, investigate, and stop illegal robocall traffic and spoofing associated with its services. ZYFYO will cooperate with traceback requests, verify customers, monitor for suspicious activity, work with upstream providers, and suspend or terminate abusive users consistent with its robocall mitigation program.

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| Prepared for: ZYFYO LLC | Prepared date: July 9, 2026 |
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