

Cinch Solutions, Inc.

Robocall Mitigation Plan

Filed pursuant to 47 C.F.R. § 64.6305 and the FCC Robocall Mitigation Database (RMD) filing requirements.

Filer	Cinch Solutions, Inc.
FRN	0038441028
Provider role in call chain	Terminating voice service provider (inbound call answering and forwarding on behalf of business end users)
STIR/SHAKEN status	No implementation — exempt under 47 C.F.R. § 64.6305(d)(2)(i) (see § 2)
Effective date	July 20, 2026

1. Filer and Nature of Service

Cinch Solutions, Inc. (“Cinch”) operates a customer engagement platform used by multi-location B2C businesses (franchises, franchise groups, and multi-unit operators across automotive services, home services, pet care, fitness, food and beverage, and similar industries). As part of the platform, Cinch offers an AI Voice Call Assistant service through which Cinch **receives inbound telephone calls from consumers** that have been placed to phone numbers associated with Cinch’s business customers, answers those calls on behalf of the business (including automated handling of common inquiries, appointment booking, and messaging), and, where appropriate, connects the caller through to the business location for a live representative.

Cinch does not originate any outbound voice calls to consumers. Cinch does not place appointment reminder calls, missed-call callbacks, dialer campaigns, or any other outbound voice calls to consumer telephone numbers from Cinch’s own service.

Third-party telephony integrations. Cinch integrates with third-party telephony platforms (for example, Aircall) solely to receive call-event data and to synchronize contact and call-history records for analytics purposes. Cinch’s automation may add or remove contact records in a business customer’s own account on such a platform, but Cinch does not initiate calls through it. Any calls placed to those contacts are originated by the business customer’s own personnel, on the third party’s telephony

infrastructure, under that third party's STIR/SHAKEN and Robocall Mitigation Database obligations — not by Cinch.

There are two paths by which an inbound call may reach the business location, and Cinch's role differs on each:

- **SIP redirect (call forwarding).** Where the call is simply forwarded to the business location without AI engagement, Cinch effects a SIP redirect (302) and does not originate an outbound call leg. Cinch is not in the media path for the ensuing conversation.
- **AI Voice transfer (bridged outbound leg).** Where Cinch's AI Voice first answers and then transfers the caller to the business, Cinch originates an outbound call leg from its platform to the business location and bridges the two legs. This outbound leg terminates at the business (not at any consumer) and is signed by Cinch's upstream carrier as an Intermediate Service Provider.

For purposes of 47 C.F.R. § 64.1600(r), Cinch is a voice service provider. Cinch's role in the call chain is primarily **terminating** (with respect to the consumer-originated inbound calls that Cinch answers on behalf of its business customers), with a limited originating function on the AI Voice transfer bridge leg to the business location described above.

2. STIR/SHAKEN Implementation Status

Cinch does not sign calls with its own SHAKEN certificate or SPC token. The inbound calls Cinch handles are originated by consumers using their own voice service providers, and those originating carriers are responsible for signing under 47 C.F.R. § 64.6301. On the AI Voice transfer bridge leg described in § 1, the call is originated to a business location (not to a consumer) and is signed by Cinch's upstream carrier as an Intermediate Service Provider.

Cinch does not control the network infrastructure necessary to implement STIR/SHAKEN and cannot obtain or use its own Service Provider Code (SPC) token. Pursuant to 47 C.F.R. § 64.6305(d)(2)(i), a voice service provider that lacks control over the network infrastructure necessary to implement STIR/SHAKEN is not required to implement the framework and instead certifies to no STIR/SHAKEN implementation and maintains a robocall mitigation program. Accordingly, Cinch certifies no STIR/SHAKEN implementation and files this Robocall Mitigation Plan, consistent with 47 C.F.R. § 64.6305(a), describing the reasonable steps it takes to avoid facilitating illegal robocall traffic through its service.

3. Robocall Mitigation Program

Cinch's robocall mitigation program is designed for its role as an inbound-focused terminating voice service provider. The specific reasonable steps Cinch takes to avoid facilitating illegal robocall traffic are:

- **Consumer-initiated architecture.** Cinch's voice service is architected such that Cinch does not originate any outbound voice calls to consumer telephone numbers. Cinch's platform answers inbound consumer-originated calls and, where needed, either redirects them (SIP 302) or bridges them via an outbound leg to the business location. This architectural constraint prevents Cinch's service from being used to originate unwanted outbound calls to consumers.
- **Know-Your-Customer at onboarding.** Cinch verifies the identity and business legitimacy of each business customer before enabling voice service, including business name, address, and confirmation of a legitimate multi-location B2C business use case.
- **Acceptable Use Policy and contract terms.** Cinch's customer terms prohibit use of the platform in connection with unlawful telemarketing, prohibited robocalling, spoofed caller ID, or any conduct that would violate the TCPA, the Truth in Caller ID Act, or state telemarketing laws, and reserve Cinch's right to suspend or terminate service for violation.
- **Caller-ID integrity on the AI Voice transfer bridge leg.** When Cinch bridges a caller to a business location via an outbound leg, Cinch presents caller identification that accurately reflects the originating consumer and does not spoof or alter caller ID for unlawful purposes. Cinch does not knowingly transmit misleading or inaccurate caller ID information on any bridge leg.
- **Monitoring for anomalous traffic patterns.** Cinch monitors call patterns on its platform for signs of misuse, including inbound call volume to a business account inconsistent with its stated business profile, or evidence that a business customer is attempting to use Cinch's service in a manner inconsistent with the Acceptable Use Policy.
- **Investigation and remediation.** When suspicious activity or a credible complaint is identified, Cinch investigates, may throttle or suspend the responsible business customer, and takes corrective action up to and including termination.
- **Call-blocking cooperation.** Cinch does not attempt to circumvent lawful call-blocking decisions made by upstream or downstream providers, and cooperates with industry blocking and traceback programs.

4. Cooperation with Traceback and Enforcement

Pursuant to 47 C.F.R. § 64.6305(a), Cinch commits to respond within 24 hours to any traceback request from the FCC, federal or state law enforcement, or the registered industry traceback consortium (the Industry Traceback Group), and to cooperate fully with such entities in investigating suspected illegal robocall traffic that has passed through or terminated on Cinch's service. Because Cinch is primarily a terminating provider, Cinch's traceback role is to promptly identify the business customer to whose number an implicated call was routed and to preserve associated records.

5. Plan Maintenance

Cinch will review and update this plan no less than annually, will recertify this filing in the RMD on or before March 1 of each year as required by 47 C.F.R. § 64.6305(b)(1), and will update the RMD and CORES within ten (10) business days of any material change to the information submitted.

6. Robocall Mitigation Point of Contact

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7. Certification

I certify under penalty of perjury that I am a duly authorized officer of Cinch Solutions, Inc. and that the information in this Robocall Mitigation Plan and in Cinch's associated RMD filing is true, complete, and accurate to the best of my knowledge, information, and belief.

Name	Girish Manwani
Title	CTO
Signature	Girish Manwani
Date	07/20/2026