

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Company: fluents.ai

Address: 59 Park Terrace, Mill Valley CA 94941

Filing Type: Non-Gateway Intermediate Provider

STIR/SHAKEN Status: No STIR/SHAKEN Implementation (Option 3)

1. Overview and Provider Role Fluents.ai operates as a real-time conversational AI and voice automation architecture platform. In the context of the Federal Communications Commission (FCC) framework, fluents.ai acts as a Non-Gateway Intermediate Provider. Fluents.ai does not hold direct numbering resources or operate as a facilities-based carrier natively signing calls with its own STIR/SHAKEN certificates. Instead, the company utilizes compliant, Tier-1 underlying Communications Platform as a Service (CPaaS) providers (such as Telnyx and Twilio) for PSTN connectivity, voice stream routing, and underlying STIR/SHAKEN attestation.

2. Robocall Mitigation Program: Reasonable Steps To prevent the carrying or processing of illegal robocall traffic, fluents.ai has implemented a comprehensive Robocall Mitigation Program incorporating the following measures:

- **Strict Know Your Customer (KYC) Protocols:** Fluents.ai enforces a rigorous onboarding process for all clients utilizing its conversational AI tools. Account approval requires verified identity and a clear business use case.
- **Vetting of Upstream Providers:** Fluents.ai strictly routes traffic through reputable, FCC-compliant underlying carriers and CPaaS partners. We verify that all underlying network partners are actively listed in the FCC Robocall Mitigation Database and maintain their own robust STIR/SHAKEN implementations.
- **Acceptable Use Policy and Contractual Enforcement:** All customers are legally bound by our Acceptable Use Policy, which strictly prohibits the generation of illegal robocalls, caller ID spoofing, and unsolicited telemarketing. Any violation of the Telephone Consumer Protection Act (TCPA) or TRACED Act yields immediate suspension or termination of the offending account.
- **Traffic Monitoring and Analytics:** Fluents.ai actively monitors API usage and call traffic patterns. Automated alerts flag suspicious behaviors, such as unnatural volume spikes or disproportionate amounts of short-duration calls, prompting immediate internal review and mitigation.

3. Commitment to Traceback Requests Fluents.ai strictly complies with FCC requirements regarding traceback cooperation. The company affirmatively commits to:

- Respond fully and comprehensively to all traceback requests from the FCC, law enforcement agencies, and the Industry Traceback Group (ITG) within 24 hours of receipt.

- Cooperate diligently with these entities in investigating and stopping any illegal robocallers attempting to utilize the fluents.ai service to carry or process calls.

Designated Point of Contact for Traceback & Mitigation:

- **Name:** Florent de Goriainoff
- **Title:** Chief Executive Officer
- **Company:** fluents.ai
- **Phone:** +1-417-450-2386
- **Email:** *florent@fluents.ai*