

ROBOCALL MITIGATION PLAN

Business Information

Company Name: Wizard Perks, Inc.

Corporate Address: 215 W Superior St, Floor 7, Chicago, IL 60654

Contact Information for Robocall Issues

Designated Contact: Faizan Bhatti

Title: Chief Executive Officer

Email: legal@wizardperks.com

Phone: (415) 678-1378

1. Overview & Regulatory Purpose

Pursuant to the Federal Communications Commission ("FCC") regulations set forth in *Call Authentication Trust Anchor*, Sixth Report and Order, 38 FCC Rcd. 2573 (2023), all Voice Service Providers ("VSPs") are mandated to submit a Robocall Mitigation Plan ("RMP") detailing reasonable measures implemented to prevent the origination and transmission of illegal robocalls.

Wizard Perks, Inc. ("Wizard Perks") operates as a non-facilities-based telecommunications reseller (MVNO). This RMP outlines our technical, contractual, and administrative safeguards designed to enforce compliance, conduct rigorous subscriber vetting, and coordinate with upstream carrier networks to eliminate fraudulent voice traffic.

2. Operational Model & Risk Profile

Wizard Perks provides mobile connectivity solutions distributed through enterprise and employer-partner perks platforms. Service is provisioned exclusively to verified individual end-users and corporate beneficiaries.

Key Risk Mitigation Controls:

- **No Public Mass Marketing:** Service is not offered to high-volume call centers, commercial telemarketers, or dialer-based operations.
- **Direct-to-User Provisioning:** Lines are assigned strictly on a 1:1 ratio to verified individuals.
- **Network-Level Call Authentication:** Wizard Perks relies on its underlying facilities-based wholesale carrier partners to execute STIR/SHAKEN call authentication and digital certificate signing at the origin of the transmission.
- **Prohibited Arbitrary Caller ID:** Outbound Caller ID is locked to the North American Numbering Plan ("NANP") numbers provisioned by our upstream carrier partners. Subscribers cannot inject arbitrary or spoofed CLI/ANI.

3. Know Your Customer ("KYC") Framework

Because Wizard Perks operates a curated enterprise benefit network, our onboarding process inherently prevents illegal robocall risks through multi-layered verification:

1. **Eligibility Validation:** Users must enroll through authorized enterprise account links, corporate email verification, or employer partner access mechanisms.
2. **Identity & Billing Verification:** Subscribers must complete identity validation and supply valid, recurring payment credentials registered under their legal name.
3. **Contractual Binding:** Prior to service activation, every subscriber must accept the Wizard Perks Terms of Service and Acceptable Use Policy (“AUP”), explicitly prohibiting automated dialing, illegal telemarketing, and voice spam.
4. **No Bulk/Wholesale Origination:** Accounts are restricted to standard consumer-scale usage. Wholesale voice trunking and SIP-traffic origination are strictly prohibited.

4. Upstream Carrier Reliance & Coordination

Wizard Perks functions as a non-facilities-based reseller and does not own or operate physical switching, IP transmission, or core media routing infrastructure.

- **Upstream Network Partners:** Voice traffic originated from Wizard Perks lines is routed through underlying, facilities-based nationwide carriers (including underlying MVNO wholesale aggregators).
- **STIR/SHAKEN Compliance:** Master agreements with upstream carriers stipulate that the underlying carrier maintains full STIR/SHAKEN compliance, attaches identity tokens, and handles SIP-level call authentication before passing traffic onto the Public Switched Telephone Network (“PSTN”).
- **Cooperative Mitigation:** Wizard Perks collaborates with upstream carrier security teams to analyze call delivery metrics and enforce robocall mitigation rules.

5. Acceptable Use Policy (“AUP”) & Enforcement

The Wizard Perks AUP strictly prohibits the utilization of its services for any unlawful, fraudulent, or abusive calling practices. Expressly banned activities include:

- Transmission of illegal robocalls or non-compliant TCPA/TRACED Act telemarketing.
- CLI/Caller ID spoofing or deceptive identity masking.
- Deployment of Automatic Telephone Dialing Systems (“ATDS”), predictive dialers, or continuous automated voice origination.
- Harassment, spam, or unauthorized commercial solicitations.

Enforcement Protocol: Wizard Perks reserves the explicit contractual right to immediately suspend or terminate any user line found to be in violation of the AUP without prior notice.

6. Traffic Monitoring, Traceback Protocols & Do Not Originate (“DNO”)

- **Traceback Response SLA:** Wizard Perks maintains a dedicated compliance point of contact (legal@wizardperks.com) to handle inquiries from the Industry Traceback Group (“ITG”), the FCC, and law enforcement. Wizard Perks commits to fully responding to official traceback requests within **24 hours**.
- **Suspicious Activity Escalation:** Upon receipt of an anomaly alert or traceback notice, Wizard Perks cross-references the assigned NANP resource, pulls Call Detail Records

("CDRs") in coordination with upstream partners, and identifies the originating subscriber.

- **Immediate Mitigation:** Lines confirmed to originate illegal, fraudulent, or high-volume robocall traffic are permanently disconnected.
- **Do Not Originate (DNO) Execution:** Wizard Perks adheres to ITG DNO requirements and coordinates with upstream carriers to block originating calls from invalidated, unallocated, or spoofed numbers.

7. Ongoing Maintenance & Plan Updates

Wizard Perks reviews this Robocall Mitigation Plan periodically to adapt to evolving FCC mandates and telecommunications industry best practices. Any material modifications to this plan will be published internally and submitted as an update to the FCC Robocall Mitigation Database within ten (10) business days.

8. Certification & Regulatory Declarations

I, Faizan Bhatti, CEO of Wizard Perks, Inc., hereby certify under penalty of perjury that:

1. Wizard Perks, Inc. is a non-facilities-based reseller and does not possess direct control over core IP routing infrastructure necessary to independently execute STIR/SHAKEN digital certificate signing.
2. The legal name and primary business address of the entity are:
Wizard Perks, Inc.
215 W Superior St, Floor 7, Chicago, IL 60654
3. Wizard Perks, Inc. operates under no former or alternate business names.
4. Neither Wizard Perks, Inc. nor its principals have been subject to FCC license revocations, database removal enforcement, or regulatory proceedings regarding illegal robocalling or spoofing.
5. Wizard Perks, Inc. does not possess an Operating Company Number ("OCN").
6. Wizard Perks, Inc. acts as a Voice Service Provider serving end-users without a direct STIR/SHAKEN signing obligation due to its pure reseller status, relying on its underlying wholesale carriers for STIR/SHAKEN framework execution.



Signature:

Name: Faizan Bhatti

Title: Chief Executive Officer, Wizard Perks, Inc.

Date: July 25, 2026