

Robocall Mitigation Program Description

Code Savant LLC

FCC Registration Number (FRN): 0038719217

Submitted under 47 CFR § 64.6305(d)(2) in support of a Voice Service Provider certification

Certification: no STIR/SHAKEN implementation (47 CFR § 64.6305(d)(1)(iii))

Claimed exemption: 47 CFR § 64.6304(b) — incapable of obtaining an SPC token

Date: July 29, 2026

Code Savant LLC ("Code Savant") operates an AI receptionist service ("Axis") for contracted small home-services businesses. It does not sell voice service to the general public, does not provide SIP trunking, softphones, or any dialable telephony credential to its subscribers, and originates no marketing, campaign, or survey traffic. Its robocall mitigation program is maintained pursuant to 47 CFR Sec. 64.6305(a) and is reasonably designed to avoid originating illegal robocall traffic. The elements below track 47 CFR Sec. 64.6305(d)(2)(i) through (iv) in order.

1. Extension received and its basis

47 CFR Sec. 64.6305(d)(2)(i)

Code Savant is subject to the exemption at 47 CFR Sec. 64.6304(b): a voice service provider that is incapable of obtaining a Service Provider Code (SPC) token due to Governance Authority policy is exempt from the requirements of Sec. 64.6301 until it is capable of obtaining one.

The basis is that the Governance Authority's SPC Token Access Policy conditions issuance on the applicant holding a current FCC Form 499A filer identification number, an assigned Operating Company Number (OCN), and direct access to telephone numbers from the numbering administrators. Code Savant satisfies none of these conditions. It holds no OCN, it is not assigned numbering resources directly, and it is not a facilities-based carrier. It is therefore incapable of obtaining an SPC token and cannot sign calls under STIR/SHAKEN.

Independently, and as the alternative basis contemplated by Sec. 64.6305(d)(2)(i), Code Savant lacks control over the network infrastructure necessary to implement STIR/SHAKEN. Its platform does not originate SIP traffic. Every telephone number it uses is obtained from its underlying voice service provider, which holds the numbering resources, operates the SIP network over which calls are carried, and performs caller identification authentication on that traffic. Should Code Savant obtain an OCN and an SPC token in future, it will implement STIR/SHAKEN authentication and amend this filing within the period required by Sec. 64.6305(d)(5).

2. Specific reasonable steps taken to avoid originating illegal robocall traffic

47 CFR Sec. 64.6305(d)(2)(ii)

Who is called. Outbound calls fall into two categories only: (1) notifications to a subscriber's own staff — that a new enquiry arrived, that an appointment on their calendar is approaching, or that a booking needs their attention — placed to numbers the subscriber entered in their own account settings; and (2) appointment reminders to a person who booked an appointment with that subscriber, which are transactional, tied to a specific appointment record, and triggered either by that appointment's own scheduled reminder or by the subscriber pressing a button in their

dashboard.

No list dialling — an architectural control, not a policy. The platform has no predictive dialler, no campaign engine, and no capability to load a calling list. A call can only exist where an appointment or enquiry record already exists, created by an inbound contact from that person or by the subscriber. Code Savant does not purchase, rent, or scrape telephone numbers. Because the capability to originate bulk traffic is absent from the software rather than prohibited by rule, it cannot be enabled by a subscriber, by a change of configuration, or by misuse of credentials.

Subscribers are given no telephony access. Subscribers receive no SIP credentials, no trunk, no softphone, and no ability to place calls directly or to present caller identification of their choosing. Trunk credentials are held solely by Code Savant. Every call is placed by Code Savant's own platform presenting a telephone number that Code Savant provisioned for that subscriber from its underlying provider.

Know your customer (47 CFR Sec. 64.1200(n)(4)). Subscribers are contracted businesses that complete a paid signup with verified payment before any telephone number is provisioned to them. Identity is established through that payment relationship and through the business details captured at signup. No telephone number is issued, and no outbound calling is possible, before that is complete. Each subscriber is issued a dedicated direct inward dial number which is presented as the caller identification on their traffic, so every call is attributable to one identified business at the time it is placed.

Upstream providers. Code Savant has no upstream providers to know. It accepts no call traffic from any other provider for origination, carriage, or processing. It originates only traffic generated by its own platform on behalf of its own contracted subscribers, and it is neither a gateway provider nor a non-gateway intermediate provider. Its sole telephony relationship is with the underlying provider that carries its outbound calls.

Analytics systems and third-party vendors. Code Savant uses no third-party analytics vendor for robocall mitigation, call analytics, or traffic screening, and engages no third party to perform robocall mitigation on its behalf. It does not operate a call-blocking analytics engine, because it neither carries nor terminates traffic from third parties and therefore has no such traffic to screen: the only calls on its platform are the transactional calls described above, each traceable to one subscriber and one triggering record. In place of analytics, mitigation is achieved by the architectural controls described in this section and by the monitoring described below.

Monitoring and records. Outbound volume is reviewed against expected activity, and any subscriber whose traffic departs from the transactional pattern described above is suspended pending review. Every outbound message is recorded against the originating subscriber, its purpose, and the appointment or enquiry that caused it. Outbound calls are logged with the record that triggered them, from which the originating subscriber is identifiable. Records are retained and can be produced on request.

Opt-out. Opt-out requests are honoured platform-wide and suppress further contact to that

telephone number across all subscribers, not only the subscriber whose traffic prompted the request.

Enforcement against subscribers. Subscriber access to outbound calling is provisioned by Code Savant and can be suspended by Code Savant unilaterally and immediately, without the subscriber's cooperation and without affecting the records of prior traffic. Suspension is applied on evidence of traffic departing from the transactional pattern above, on a traceback implicating the subscriber, or at the request of the Commission or law enforcement.

3. Traceback commitment

47 CFR Sec. 64.6305(d)(2)(iii)

Code Savant commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Person responsible for robocall mitigation. Nathan Cliff Broderick, Member, Operations, Code Savant LLC — telephone 801-310-9878, email nate@codesavant.tech. This mailbox is monitored daily.

4. Prior Commission, law enforcement, or regulatory action

47 CFR Sec. 64.6305(d)(2)(iv)

At no time in the prior two years has Code Savant LLC — or any entity with which it shares common ownership, management, directors, or control — been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or due to a deficient Robocall Mitigation Database certification or mitigation program description. Code Savant has not previously filed in the Robocall Mitigation Database; this is its initial filing, and no prior certification of Code Savant has been removed by Commission action.

5. Supplementary information

47 CFR Sec. 64.6305(d)(4)

- Operating Company Number (OCN): none. Code Savant holds no OCN.
- Other business names in use: none.
- Business names previously used: none.
- Foreign voice service provider: no. Code Savant is a domestic provider.
- Principals, affiliates, subsidiaries, and parent companies: none.

Code Savant will update this filing within 10 business days of any change to the information required by 47 CFR Sec. 64.6305(d)(1) through (4), and will recertify annually on or before March 1 in accordance with 47 CFR Sec. 64.6305(h) and 47 CFR Sec. 1.16.