

# Robocall Mitigation Program Description

Ninety Nine Technologies LLC | DBA: Talkloop | Effective August 7, 2026

|                     |                                                      |
|---------------------|------------------------------------------------------|
| Provider            | Ninety Nine Technologies LLC                         |
| Service model       | Software-based reseller of business calling services |
| Underlying provider | Telnyx LLC                                           |
| Abuse contact       | hello@talkloop.ai                                    |

## 1. Provider and Service Overview

Ninety Nine Technologies LLC, doing business as Talkloop, provides business customers with access to calling software and resells telephone numbers and underlying voice service obtained from Telnyx LLC. Customers use the Talkloop software to place calls. All outbound calls are routed through Telnyx for transmission over Telnyx-controlled network facilities.

Ninety Nine Technologies does not independently operate the network infrastructure or STIR/SHAKEN authentication systems used to digitally sign calls. Telnyx performs the applicable caller ID authentication functions on the underlying network. Ninety Nine Technologies nevertheless takes reasonable steps to prevent its service from being used to originate illegal robocalls and complies with the practices described in this program.

## 2. Customer Identification and Due Diligence

Before activating service, Ninety Nine Technologies obtains and reviews information reasonably designed to identify the prospective business customer and understand its proposed use of the service. This process includes:

- Obtaining business identification and incorporation or organizational documents.
- Reviewing the customer's identity and business information before enabling calling service.
- Considering whether the customer's proposed calling activity is consistent with its stated business purpose.
- Declining or delaying activation when submitted information is materially incomplete, inconsistent, or raises concerns about unlawful calling.

## 3. Telephone Number and Caller ID Controls

Customers may use only telephone numbers assigned to their accounts. Ninety Nine Technologies does not authorize customers to present arbitrary, misleading, or unauthorized calling numbers. These restrictions are intended to reduce spoofing and help ensure that calls can be associated with the responsible customer account.

All calls are routed through Telnyx. Ninety Nine Technologies relies on Telnyx's underlying network for applicable STIR/SHAKEN authentication while maintaining responsibility for its own customer-facing controls and mitigation practices.

## 4. Traffic Monitoring

Ninety Nine Technologies monitors calling activity for high-volume and unusual calling behavior. When activity appears inconsistent with the customer's expected use, the company may investigate the account, restrict calling, request supporting information, or suspend service. Review may consider calling volume, abrupt changes in activity, repeated short-duration calls, complaints, traceback notices, and other indicators reasonably associated with abusive or illegal traffic.

## 5. Investigation, Suspension, and Termination

Ninety Nine Technologies promptly investigates credible indications that its service is being used for illegal calling or unauthorized caller ID use. The company may immediately suspend an account or its calling capability when illegal calling is detected or reasonably suspected. Depending on the facts, Ninety Nine Technologies may also terminate service, preserve relevant account and call records, and cooperate with Telnyx, the Commission, law enforcement, and the registered industry traceback consortium.

A customer whose service is restored following review remains subject to continued monitoring and all applicable service restrictions. Repeated or substantiated illegal activity is grounds for termination.

## 6. Complaints and Abuse Reports

Abuse complaints may be submitted to [hello@talkloop.ai](mailto:hello@talkloop.ai). Ninety Nine Technologies reviews credible complaints, associates them with the relevant customer account when possible, examines available account and calling information, and takes appropriate action. Urgent or substantiated reports may result in immediate calling restrictions or suspension while the matter is investigated.

## 7. Traceback and Government Cooperation

The Ninety Nine Technologies compliance team is responsible for responding fully and within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, and the registered industry traceback consortium. The company will cooperate with these entities and with Telnyx in investigating and stopping illegal robocalls that use its service.

Responses will be based on available customer, number-assignment, account, and calling information. Ninety Nine Technologies will take prompt remedial action when a traceback or government inquiry identifies suspected misuse of its service.

## 8. Records and Program Administration

Ninety Nine Technologies maintains customer verification, number-assignment, complaint, investigation, and enforcement information as reasonably necessary to administer this program and respond to lawful inquiries. Access is limited to personnel with a business need, subject to applicable contractual, privacy, and legal requirements.

The compliance team oversees this program, coordinates responses, and updates relevant procedures when the company's services, risks, legal obligations, or upstream-provider arrangements change. Personnel involved in customer activation, account support, or abuse handling are expected to follow these controls.

## 9. Commitment to Mitigation

Ninety Nine Technologies is committed to taking reasonable steps to avoid originating illegal robocall traffic, complying with this program, responding fully and within 24 hours to qualifying traceback requests, and cooperating with the Commission, law enforcement, the registered industry traceback consortium, Telnyx, and other relevant providers to investigate and stop illegal robocalls.