

# ROBOCALL MITIGATION PROGRAM

## Screen-Magic Mobile Media Inc.

**FRN:** 0038516605

**Filer:** Screen-Magic Mobile Media Inc.

**Products:**

- SMS Magic
- Conversive

**Implementation Status:**

Voice Service Provider without a STIR/SHAKEN implementation obligation

## 1. Purpose

This Robocall Mitigation Program ("RMP") describes the policies and procedures implemented by Screen-Magic Mobile Media Inc. ("SMS Magic") to prevent the origination or facilitation of illegal robocalls through its platform.

SMS Magic is committed to complying with all applicable FCC regulations, supporting industry traceback efforts, and maintaining appropriate controls to mitigate unlawful voice traffic.

## 2. Company Overview

Screen-Magic Mobile Media Inc. is a cloud communications platform (CPaaS) that enables businesses to communicate with customers through multiple communication channels, including:

- SMS
- Voice
- RCS
- WhatsApp Business
- Other conversational messaging channels

SMS Magic currently offers voice capabilities, including call forwarding, and is expanding its voice communications platform for business customers.

SMS Magic does not own or operate Public Switched Telephone Network (PSTN) infrastructure. Voice services are delivered through licensed telecommunications providers that provide the underlying voice network and call termination services.

### **3. Voice Service Architecture**

SMS Magic operates as a Voice Service Provider using the infrastructure of licensed carrier partners.

The company:

- provisions voice services for authenticated business customers;
- manages customer onboarding and service configuration;
- relies on underlying carrier partners for network connectivity and call termination;
- does not operate its own switching infrastructure or implement STIR/SHAKEN authentication within its own network.

### **4. Customer Verification and Onboarding**

Before enabling voice services, SMS Magic performs customer due diligence appropriate to the services being provided.

Customer onboarding includes verification of:

- Business identity
- Company name
- Business email
- Contact Number
- Customer use case validation
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- High-risk industries will undergo additional review.
- Voice service is activated only after internal approval.
- Ensure Compliance with SMS Magic Terms of Service and Acceptable Use Policy

Customers identified as presenting elevated compliance or fraud risks may be subject to additional review before voice services are enabled.

SMS Magic reserves the right to deny or suspend service where sufficient information is not provided or where the intended use appears inconsistent with applicable laws or company policies.

## 5. Acceptable Use Policy

SMS Magic prohibits the use of its platform for:

- Illegal robocalling
- Caller ID spoofing intended to defraud or mislead
- Fraudulent calling campaigns
- Scam or phishing activities
- Any activity prohibited under applicable FCC regulations

Customers found to be violating these requirements may have their services suspended or terminated immediately.

## 6. Traffic Monitoring and Abuse Prevention

SMS Magic monitors platform activity to identify unusual or potentially abusive behavior.

Monitoring activities include, where applicable:

- Review of abnormal calling patterns
- Investigation of customer complaints
- Review of suspected fraudulent activity
- Cooperation with underlying carrier notifications
- Internal investigation of suspected policy violations

Where suspicious activity is identified, SMS Magic may:

- temporarily suspend services;
- request additional customer information;
- terminate customer access where appropriate.

SMS-Magic also collaborates with its carrier partners to investigate and address potentially unlawful or non-compliant traffic

## 7. Underlying Carrier Compliance

SMS Magic utilizes established telecommunications providers to deliver voice services.

Underlying carrier partners maintain network-level controls, including call routing, termination, and regulatory compliance mechanisms applicable to their networks.

SMS Magic coordinates with these providers to ensure continued regulatory compliance and to investigate suspected unlawful traffic where required.

## 8. Traceback Cooperation

SMS Magic is committed to cooperating with:

- Federal Communications Commission (FCC)
- Law enforcement agencies
- The Industry Traceback Group (ITG)
- Underlying carrier partners

Upon receipt of a legitimate traceback request, SMS Magic will promptly investigate the request, identify the relevant customer where possible, preserve available records, and cooperate in accordance with applicable regulatory requirements.

## 9. Record Retention

SMS Magic maintains records relevant to customer onboarding and platform activity in accordance with applicable legal, contractual, and operational requirements.

Relevant information may be preserved as necessary to support investigations, regulatory requests, or traceback activities.

## 10. Continuous Compliance

SMS Magic periodically reviews its compliance processes and updates its internal controls as its voice platform evolves.

The company remains committed to:

- preventing illegal robocalls;
- complying with applicable FCC regulations;
- maintaining appropriate customer verification procedures;

- cooperating with regulatory authorities and carrier partners; and
- continuously improving its robocall mitigation practices.