

Robocall Mitigation Program Description

Sameday AI Inc. | Submitted to the Federal Communications Commission Robocall Mitigation Database pursuant to 47 CFR § 64.6305

Filer	Sameday AI Inc. (d/b/a Sameday AI)
FCC Registration Number (FRN)	0038851531
Business Address	1064 S North County Blvd, Pleasant Grove, Utah 84062
Provider Type	Voice service provider; non-facilities-based reseller of Telnyx LLC
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Effective Date	September 1, 2026

1. Company Overview and Provider Classification

Sameday AI Inc. ("Sameday") operates an AI-powered voice and communications platform for residential home services contractors, including HVAC, plumbing, electrical, roofing, and pest control companies (the "Platform"). The Platform answers inbound calls to a customer's business phone number, books and confirms service appointments, and places outbound calls on the customer's behalf to the customer's own callers, clients, and consented contacts, such as returning missed calls, confirming scheduled appointments, following up on service requests, and reaching customer-provided contact lists as described in Section 4.1.

Sameday does not own or operate switching or transport infrastructure. All numbering resources, inbound routing, and outbound termination are provided by Telnyx LLC ("Telnyx"), a voice service provider registered in the Robocall Mitigation Database. Because Sameday furnishes interconnected voice communications to business end users using North American Numbering Plan resources, Sameday files as a voice service provider and has implemented the robocall mitigation program described below with respect to all calls that originate on the Platform. Sameday does not act as a gateway provider or a non-gateway intermediate provider.

Sameday's customer base is limited to operating home services businesses in the United States. Sameday does not sell wholesale voice service, does not resell numbering resources, does not accept traffic from other carriers or resellers for termination, and does not provide dialer, lead generation, or telemarketing services to third parties.

2. STIR/SHAKEN Caller ID Authentication

Sameday does not hold its own Service Provider Code token or STIR/SHAKEN certificate. Every outbound call originated on the Platform is handed directly to Telnyx over authenticated SIP trunking, and Telnyx applies STIR/SHAKEN authentication to the call before it leaves the Telnyx network. Sameday's telephone numbers are provisioned directly from Telnyx inventory or ported into Telnyx on

behalf of the specific customer that will use them, which allows Telnix to attest to the caller's authorization to use the number. Sameday does not permit customers to set an arbitrary outbound caller ID; the caller ID on every outbound call is the verified business number assigned to that customer's account, and Section 10(c) of the Customer Terms and Conditions prohibits use of any number the customer does not own or hold written authorization to use. Ported numbers require a signed letter of authorization and a recent bill or customer service record from the losing carrier (Section 12.2).

Because Sameday does not own, lease, operate, or control the network infrastructure necessary to implement STIR/SHAKEN, the implementation obligations of 47 CFR § 64.6301 do not apply to Sameday, as the Commission recognized for non-facilities-based providers in the First Caller ID Authentication Report and Order, FCC 20-42, at paragraph 40. Sameday remains fully responsible for the customer diligence, monitoring, traceback, and cooperation measures described in this program, and will implement STIR/SHAKEN directly if it acquires control of its own network infrastructure or the Commission's rules change.

3. Know Your Customer Procedures (47 CFR § 64.1200(n)(4))

Sameday takes affirmative, effective measures to prevent new and renewing customers from using the Platform to originate illegal calls. Sameday does not currently offer self-serve account registration; every account is created and activated by Sameday staff. Before any customer account is enabled for voice service, Sameday collects and verifies the following:

- Legal business name, operating (DBA) name, and physical business address.
- Name, title, email address, and direct phone number of the business owner or authorized principal executing the agreement.
- Business website and trade, which are reviewed for consistency with the customer's stated business and the home services market Sameday serves.
- The customer's existing business telephone number(s), which are confirmed as belonging to the business through the port-in process or a live verification call before they are used as caller ID.
- A valid payment method (credit card or ACH) on file before service is activated.
- Acceptance of Sameday's Customer Terms and Conditions (publicly posted at support.gosameday.com), which restrict the service to U.S. customers using U.S. numbers for their own business (Sections 2.1 and 9(ix)); prohibit calls to any person who has not provided legally required consent, unsolicited robocalls, false or unauthorized caller ID, traffic pumping and short-duration autodialing, and any transit, wholesale, or intermediate-provider use (Section 10); and make the customer solely responsible for TCPA, Telemarketing Sales Rule, state mini-TCPA, and do-not-call compliance (Section 11).

Each new account is onboarded through a live session with a Sameday customer success representative, during which the customer's field service management system (for example, ServiceTitan) is connected and the customer's service area, business hours, and call handling rules are configured. This integration step provides additional confirmation that the customer is an operating contracting business with real jobs, technicians, and customers. Accounts that cannot be

verified are not activated. Sameday reviews customer account information on an ongoing basis through its customer success team and requires customers to update ownership, contact, and address information when it changes.

4. Reasonable Steps to Avoid Originating Illegal Robocall Traffic

4.1 Controls on outbound calling

Outbound calls on the Platform fall into two categories. The first is event-triggered calls to individuals who already have a relationship with the customer's business: people who called the business, submitted a service request or web form, or have a scheduled or completed job. These calls are initiated by a specific event in the customer's workflow and are tied to an identifiable contact record.

The second is calls to contact lists that the customer uploads to the Platform. Before any uploaded list can be called, the customer must affirm within the Platform that every contact on the list has provided the consent required under the Telephone Consumer Protection Act and applicable state law to receive calls of that type from the customer's business, including prior express written consent where the calls are telemarketing. The Platform records this affirmation, the user who made it, the timestamp, and the list it applies to, and lists without an affirmation cannot be called. The Platform does not sell, source, or provide contact lists to customers, and does not offer ringless voicemail or voice broadcast delivery. Every call to an uploaded contact is placed as an individual, attended AI call under the customer's verified business caller ID.

The consent affirmation is backed by contract. Under Section 11.2 of the Customer Terms and Conditions, each customer must obtain prior express consent, and prior express written consent where required, before any call requiring consent; must verify that any consent obtained through a lead seller, marketplace, or referral partner extends specifically to the customer and to AI-generated voice calls; and must retain producible consent records for each recipient for at least five years, including the source, timestamp, exact disclosure, and opt-out history, and produce them to Sameday within the period Sameday specifies, which may be less than one business day. Section 11.6 allows Sameday to demand consent records, opt-out records, and call scripts at any time and to suspend service if the customer does not respond or the evidence is inadequate.

4.2 Identification and disclosure

Sameday's default call scripts identify the customer's business by name at the beginning of the call and, on outbound calls, state the reason for the call, and Sameday's recording and AI disclosure announcement is enabled by default on every account. Customers control the scripts and instructions their AI agent follows. Under Sections 11.3 and 11.4 of the Customer Terms and Conditions, a customer that modifies the disclosure announcement does so on its own written determination that no disclosure is required, and the customer is solely responsible for the content of its scripts and for any identification or disclosure required by law. Called parties can request a human, request not to be called again, or end the call at any time, and opt-out requests are recorded on the contact record for that campaign.

4.3 Consent and do-not-call handling

Opt-out and do-not-call requests captured on any call are recorded against the contact and suppress further outbound calls to that number within the campaign or workflow in which the request was made. Opt-out records are available to the customer, and the customer is responsible for removing opted-out numbers from any list it subsequently uploads and for maintaining its entity-specific do-not-call list. Section 11.2(d) and (e) of the Customer Terms and Conditions require each customer to honor opt-out and revocation requests within the shorter of the legally required period or ten business days, to comply with the National Do Not Call Registry and applicable state registries, and to maintain and honor an entity-specific do-not-call list.

4.4 Volume controls and account suspension

Outbound calling is rate limited per account at the application layer, and Telnyx applies its own network-level fraud and traffic controls to all Sameday traffic. Sameday can immediately suspend outbound calling for any account at the application layer without affecting inbound service, and Telnyx can additionally suspend the associated numbers or trunk at the network layer. Sections 7.9, 10, 15.3, and 22.4 of the Customer Terms and Conditions give Sameday the contractual right to impose rate and velocity limits and to block, filter, rate-limit, suspend, or terminate any traffic, number, or account on reasonable belief of a violation, without prior notice, and Section 22.3 permits immediate termination on a suspension or blocking demand from Telnyx or a regulator. Sameday will suspend or terminate any customer found to be using the Platform to originate illegal calls.

5. Know Your Upstream Provider Procedures

Sameday does not accept traffic from any upstream provider for carriage, processing, or termination. Sameday's only carrier relationship is with Telnyx, which provides both inbound delivery of calls to Sameday's numbers and outbound termination of calls originated on the Platform. Sameday has verified that Telnyx maintains an active filing in the Robocall Mitigation Database and will confirm that status at each annual recertification and before onboarding any additional carrier. Sameday will not exchange traffic with any provider that is not listed in the Robocall Mitigation Database or whose filing has been removed by Commission action.

6. Call Analytics and Monitoring

Sameday relies on the network-level analytics and fraud controls maintained by Telnyx for automated detection of anomalous traffic, and does not use a separate third-party robocall analytics vendor. Sameday supplements those controls with its own records and review processes:

- Complete call detail records for every inbound and outbound call, including the customer account, originating and terminating numbers, timestamps, duration, and disposition, retained for not less than 18 months regardless of whether the customer relationship has ended.
- Full transcripts and recordings of AI-handled calls, which customer success staff review on a sampled basis for quality and which are available to support any complaint, traceback request, or investigation.
- Per-account records of every uploaded contact list, the consent affirmation attached to it, the campaign it was used in, and the opt-outs recorded during that campaign.

- Account review triggered by any recipient complaint, traceback request, notification from Telnyx or a regulator, chargeback or payment anomaly, or observation by customer success staff of calling activity inconsistent with the customer's business.

When a review is triggered, Sameday examines the account's call detail records, transcripts, list uploads, and consent affirmations, may pause outbound calling while the review is pending, and may require the customer to produce consent records under Section 11.6 of the Customer Terms and Conditions before outbound calling is restored. Sameday is evaluating additional automated per-account monitoring, including short-duration and opt-out rate alerting, and will update this description when those controls are in production.

7. Traceback Commitment and Cooperation

Sameday commits to respond fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium (the Industry Traceback Group), and to cooperate with such entities in investigating and stopping any illegal robocallers that use Sameday's service to originate calls. Traceback requests should be directed to the robocall mitigation contact identified above. Because every call on the Platform is tied to a verified customer account and a contact record, Sameday is able to identify the responsible customer, the specific triggering event, and the associated call records for any call originated on the Platform. On receipt of a request, Sameday preserves the request, identifies the customer and account, retrieves the responsive call detail records and any transcript or recording, identifies Telnyx as the directly connected provider where relevant, and responds within the 24-hour period measured under 47 CFR § 64.1200(n)(1). Sameday's Chief Technology Officer holds authority to respond in the primary contact's absence so that a response is not delayed. Section 21.1 of the Customer Terms and Conditions requires every customer to respond to a traceback or regulatory inquiry from Sameday within the deadline Sameday sets, which may be less than one business day, to identify the source of the calls and produce supporting records, and authorizes Sameday to share the customer's identity, contact information, and call records with the Industry Traceback Group, Telnyx, and regulators without a subpoena. Sameday may suspend the affected traffic immediately if the customer does not respond.

8. Response to Commission Notifications

Upon receiving notification from the Commission through its Enforcement Bureau that Sameday is originating illegal traffic, Sameday will promptly investigate, block or cease originating the identified traffic within the timeframe specified in the notification, and report the results of its investigation and the steps taken to the Commission as required by 47 CFR § 64.1200(n)(2). Sameday will also comply with any Commission directive regarding the identified traffic and the customer responsible for it.

9. Complaints and Recordkeeping

Sameday records and investigates complaints alleging unwanted, spoofed, or unlawful calls associated with its customers. Each complaint is linked to the responsible account and evaluated against the call detail records, transcript, and the contact's consent or relationship record. Credible complaints trigger the review, suspension, and termination procedures in Section 4. Sameday also

assists customers in resolving erroneous labeling or blocking of their legitimate business numbers through Telnyx and the applicable downstream provider processes.

Sameday retains customer verification records, number authorization and porting records, service agreements, list upload and consent affirmation records, call detail records, complaints, investigation notes, mitigation actions, and traceback requests and responses for at least 18 months after the end of the customer relationship, or longer where required by law, litigation hold, or an open investigation. Call recordings and transcripts are Customer Data; they are retained for the periods stated in Sameday's Documentation during the customer relationship and may be deleted beginning 30 days after termination under Section 22.5 of the Customer Terms and Conditions, except where subject to a litigation hold, a pending complaint or traceback request, or an open investigation. Personnel in sales, onboarding, customer success, and engineering are instructed on this program and their escalation responsibilities before handling production voice accounts.

10. Regulatory History

Neither Sameday nor any entity with which it shares common ownership, management, directors, or control has, during the two years preceding this filing, been the subject of a formal action or investigation by the Commission, a law enforcement agency, or another regulatory agency with findings of actual or suspected wrongdoing concerning illegal robocalls, caller ID spoofing, or a deficient Robocall Mitigation Database certification or mitigation program. Sameday will update its filing within 10 business days if this statement changes.

11. Program Governance and Updates

Responsibility for this program rests with Sameday's Chief Executive Officer, who has authority to suspend or terminate any account and may designate trained personnel to administer individual controls. Day-to-day monitoring is performed by the engineering and customer success teams. Revenue considerations and customer pressure do not override the obligation to stop suspected illegal traffic. Sameday reviews this program at least annually, and whenever there is a material change in its carrier relationships, numbering practices, or Platform calling capabilities, including before any introduction of self-serve account registration. Sameday will update its Robocall Mitigation Database filing within 10 business days of any change to the information contained in it and will complete the required annual recertification by March 1 of each year.

Certification

I certify that I am an officer of Sameday AI Inc. authorized to make this submission, that I have personal knowledge of the robocall mitigation program described above, and that the information contained in this description is true and accurate to the best of my knowledge.

Aaron Cooper
Chief Executive Officer, Sameday AI Inc.
Date: September 1, 2026