

ROBOCALL MITIGATION PROGRAM

FM FL SERVICES, INC (d/b/a "togodial")

1. Company Overview

FM FL Services, Inc. ("togodial") is a U.S.-based, multi-tenant cloud communications platform that provides business phone (PBX), CRM, SMS, and dialing services to end-user business customers. togodial originates voice traffic to the public switched telephone network through authorized U.S. carrier partners and terminates inbound calls to its customers.

2. Know-Your-Customer ("KYC") Procedures

Prior to activating any customer account, togodial collects and verifies the following: (a) legal business name and EIN/tax ID; (b) physical business address; (c) a valid contact name, email, and phone number; and (d) payment information matching the registered account. togodial reviews each new account for indicators of high-risk or fraudulent activity and reserves the right to suspend or refuse service to any customer that fails verification or that it reasonably suspects of engaging in unlawful robocalling, spoofing, or other abusive calling practices.

3. Know-Your-Upstream-Provider ("KYUP") Procedures

togodial originates calls exclusively through established, licensed U.S. voice carriers. Before routing traffic to an upstream provider, togodial confirms that the provider is listed in the FCC's Robocall Mitigation Database and implements STIR/SHAKEN caller ID authentication on the traffic it carries. togodial does not accept or route traffic from foreign gateway providers that fail these requirements.

4. STIR/SHAKEN Implementation

togodial relies on its upstream carrier partners, Telnix and BulkVS, to apply STIR/SHAKEN caller ID authentication and attestation to outbound calls at the point of origination, in accordance with 47 CFR Part 64. togodial's platform passes the originating number and does not modify caller ID information in a manner that would undermine attestation.

5. Call Analytics and Fraud Monitoring

togodial employs automated monitoring of calling patterns to detect anomalous or abusive behavior, including: (a) high-volume short-duration call bursts; (b) unusually high call-attempt rates from a single account; (c) repeated calls to numbers on do-not-originate or reassigned-number lists; and (d) elevated complaint or disconnect rates.

6. Blocking and Remediation Procedures

Upon detecting suspected illegal or fraudulent traffic, togodial's procedures are to: (a) immediately investigate the affected account; (b) suspend or terminate the offending account; (c) block the associated caller ID and calling patterns; and (d) report findings to the relevant upstream carrier and, where required, to law enforcement or the Commission.

7. Traceback Cooperation

togodial commits to respond fully and in a timely manner to all traceback requests from the Federal Communications Commission, law enforcement agencies, and the industry traceback consortium (USTelecom / Traceback). togodial will maintain records sufficient to identify the customer associated with any call and will cooperate in investigations and in stopping illegal robocallers, including responding to traceback requests within 24 hours to the extent practicable.

8. Contractual Provisions

togodial's terms of service and acceptable use policy prohibit customers from using the platform to place illegal robocalls, engage in spoofing, or otherwise violate applicable laws, including the Telephone Consumer Protection Act (TCPA) and the TRACED Act. Violation of these terms is grounds for immediate suspension or termination of service.

Point of Contact for Traceback and Mitigation Inquiries:

Fernando Marrero, Owner
FM FL Services, Inc.
6800 SW 40th St #118, Miami, FL 33155
(954) 310-1649
support@togodial.com