

Robocall Mitigation Program Description

VS Reserves LLC · FRN 0038883872 · EIN 99-3829896

7901 4th St N, Suite 300, St. Petersburg, FL 33702

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1. Nature of operations

VS Reserves LLC operates InsurAIFlow, a customer-relationship platform for licensed life insurance agents. The platform originates outbound voice calls and SMS messages on behalf of its subscribing agents, including calls placed by an automated AI voice agent. All telephony is carried by Telnyx LLC. VS Reserves LLC does not provide transit or terminating service to third-party carriers.

2. Consent

Outbound automated contact requires a documented consent record for the called party. Agents importing lead lists must upload evidence of the opt-in — the consenting party's submission record, including opt-in language and timestamp — which is reviewed before automated voice outreach to that batch is permitted. Lead batches are created in an unapproved state, and automated voice outreach is blocked until consent evidence is reviewed and approved. Consent records and the associated proof-of-consent artifacts are retained for not less than four years from the date of last contact, consistent with the limitations period applicable to claims under the Telephone Consumer Protection Act.

Prior-business-relationship consent requires a written source reference attributing the relationship, along with the identity of the recording user and the originating IP address.

3. Do-Not-Call compliance

VS Reserves LLC maintains a current subscription to the National Do Not Call Registry. Numbers are screened against the registry at three points: on import into the platform, before any automated AI call is placed, and before any call placed manually by an agent through the platform's dialer. A number returned as registry-listed is suppressed and cannot be dialed. Where a registry lookup cannot be completed, the automated calling system does not place the call.

Internal do-not-contact requests are recorded per contact and honored across all channels independently of the federal registry.

4. Opt-out handling

Recipients may opt out by verbal request during a call, by replying STOP to any SMS message, or by contacting support@insuraiflo.com. Opt-outs are recorded against the contact record and suppress all further automated outreach on every channel. Opt-out processing is immediate and does not require agent action.

5. Calling practices

Automated calling is restricted to permitted local calling hours in the called party's time zone, determined by area code and state of record. A per-contact frequency cap limits automated call attempts to seven per rolling seven-day period. Caller identification transmits a number assigned to the originating agent within VS Reserves LLC's Telnyx account.

6. Sub-account monitoring and enforcement

Agents subscribe to the platform as tenants under VS Reserves LLC's account. VS Reserves LLC retains the following controls:

- Agents cannot originate automated outreach until consent documentation for their contact list has been reviewed and approved.
- Per-tenant monitoring of opt-out rate, spam-flag events, and carrier error responses. VS Reserves LLC receives and reviews delivery-failure and spam notifications from Telnyx.
- VS Reserves LLC may suspend or terminate any tenant's access to automated calling and messaging at its sole discretion, and does so upon confirmed consent or do-not-call violations.
- Messaging traffic is registered under 10DLC brands and campaigns. Tenants holding their own EIN register under their own brand.

7. Traceback cooperation

VS Reserves LLC will respond fully and within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. Call detail records identifying the originating tenant, the called number, timestamp, and associated consent record are retained for not less than four years, consistent with the limitations period applicable to claims under the Telephone Consumer Protection Act.

Traceback contact: Vincent Salvatoriello, Founder — Vincent@insuraiflo.com, (703) 201-9831.

8. Caller ID authentication

VS Reserves LLC does not hold a Service Provider Code (OCN) and is therefore ineligible to obtain a STIR/SHAKEN certificate from the Policy Administrator, so caller ID authentication is not technically available to it. All voice traffic is originated through Telnix LLC, which authenticates and signs originating calls placed on numbers purchased on or ported to its network at Attestation Level A, under its own certification and Robocall Mitigation Database filing. VS Reserves LLC is not registered with the Commission as a carrier and does not operate call-signing infrastructure.

9. Point of contact

Vincent Salvatoriello, Founder — Vincent@insuraiflo.com, (703) 201-9831. Available during business hours for compliance inquiries.