

# ROBOCALL MITIGATION PROGRAM DESCRIPTION

Federal Communications Commission — Robocall Mitigation Database (RMDB)

Filed pursuant to 47 CFR § 64.6305 | TRACED Act Compliance

|                               |                                                                                                                                                                                                              |
|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Company Legal Name            | eGeniusCare LLC                                                                                                                                                                                              |
| FCC Registration Number (FRN) | 0038546511                                                                                                                                                                                                   |
| Business Address              | 10685-B Hazelhurst Dr. #41732, Houston, TX 77043                                                                                                                                                             |
| Certifying Officer            | Tanveer Javaid, Chief Executive Officer                                                                                                                                                                      |
| Contact Email                 | tanveer@egeniuscare.com                                                                                                                                                                                      |
| Contact Phone                 | 213-769-2666                                                                                                                                                                                                 |
| Service Type                  | Voice Service Provider — VoIP Services, AI-Powered Dialer Platform, Call Center Software, Predictive Dialer, Auto Dialer                                                                                     |
| Provider Roles in Call Chain  | Voice Service Provider; Non-Gateway Intermediate Provider, where eGeniusCare carries or processes PSTN traffic between originating and terminating providers without originating or terminating that traffic |
| Service Area                  | Nationwide                                                                                                                                                                                                   |
| Filing Type                   | Initial Filing — New Provider                                                                                                                                                                                |
| STIR/SHAKEN Status            | Option 3 — No STIR/SHAKEN Implementation                                                                                                                                                                     |

## 1. Introduction and Company Overview

eGeniusCare LLC is a newly established telecommunications and technology provider headquartered in Houston, Texas. The company provides VoIP and dialer-related services, including interconnected VoIP services, AI-powered dialer capabilities, predictive and automated dialing functionality, call-center software, and related voice communications services. eGeniusCare LLC intends to serve customers nationwide and may operate in more than one role within the call chain depending on the service and traffic arrangement.

## 2. Provider Roles in the Call Chain

As a Voice Service Provider, eGeniusCare LLC may originate and/or terminate voice traffic on behalf of customers and provide voice services to end users.

As a Non-Gateway Intermediate Provider, where applicable to its network architecture and traffic arrangements, eGeniusCare LLC may carry or process PSTN traffic between originating and terminating providers without originating or terminating that traffic itself. In such circumstances, eGeniusCare LLC will apply appropriate robocall mitigation measures to transit traffic and will cooperate with upstream and downstream providers and authorized traceback requests.

The company will maintain records and controls appropriate to each role in which it operates.

## 3. STIR/SHAKEN Status

eGeniusCare LLC has not yet implemented STIR/SHAKEN on its network. The company is a new provider and is currently completing the regulatory and operational prerequisites necessary for implementation.

eGeniusCare LLC will update its Robocall Mitigation Database filing and mitigation program when its STIR/SHAKEN implementation status materially changes. Until implementation is completed, the company will maintain the other reasonable robocall mitigation measures described in this program.

## **4. Robocall Mitigation Program — Voice Service Provider Activities**

eGeniusCare LLC prohibits the origination of illegal robocall traffic through its services. The company will take reasonable and effective measures designed to prevent, detect, mitigate, and remediate illegal, unwanted, fraudulent, or spoofed calling activity.

Customer onboarding and account activation controls include:

- verification of legal business identity;
- review of the customer's intended use case and calling activity;
- assessment of expected traffic volume and calling profile;
- contractual requirements prohibiting illegal robocalling, unlawful spoofing, fraud, and violations of applicable telecommunications and consumer-protection requirements; and
- appropriate review of higher-risk customers or traffic patterns.

## **5. Robocall Mitigation Program — Non-Gateway Intermediate Provider Activities**

When eGeniusCare LLC operates as a Non-Gateway Intermediate Provider, it will apply reasonable measures to avoid carrying or facilitating illegal robocall traffic through transit arrangements.

Measures may include:

- monitoring transit traffic for abnormal volume, velocity, duration, or calling patterns;
- identifying invalid, unallocated, or unassigned telephone numbers where technically feasible;
- reviewing available caller-ID and signaling information for anomalies or inconsistencies;
- identifying unusual or high-risk traffic behavior;
- cooperating with upstream and downstream providers regarding suspicious traffic;
- responding to authorized traceback and enforcement inquiries; and
- suspending, blocking, or terminating traffic or relationships when appropriate under applicable agreements and law.

## **6. Acceptable Use and Customer Requirements**

eGeniusCare LLC will maintain contractual terms and an Acceptable Use Policy applicable to customers using its voice and dialer services. The terms will prohibit illegal, abusive, fraudulent, deceptive, or misleading use of the services, including unlawful robocalling, caller-ID spoofing, and violations of applicable federal or state telemarketing, Do Not Call, calling-time, and consumer-protection requirements.

Customers using dialer functionality will be required to comply with applicable consent, Do Not Call, calling-time, and other requirements governing automated or telemarketing calls. eGeniusCare LLC may suspend or terminate services where a customer violates applicable requirements or the company's contractual terms.

## **7. Robocall Detection and Traffic Monitoring**

eGeniusCare LLC will use a layered approach to identify suspicious or potentially unlawful traffic. Depending on the service and available network data, monitoring may include:

- call volume, velocity, and duration;
- unusual spikes or rapid changes in traffic;
- high rates of short-duration calls;
- sequential or abnormal dialing patterns;
- invalid, unallocated, or unassigned destination numbers;
- answer-supervision anomalies;
- caller-ID or signaling inconsistencies;
- consumer complaints and abuse reports; and
- analytics-based alerts for potentially unlawful or abusive campaigns.

Monitoring will be proportionate to traffic volume, service type, and identified risk.

## **8. Upstream and Downstream Provider Controls**

eGeniusCare LLC will maintain appropriate due diligence and contractual controls for upstream and downstream voice providers. Where applicable, the company will verify the provider's relevant Robocall Mitigation Database status and maintain records of provider relationships.

Provider agreements may require compliance with applicable FCC robocall mitigation requirements, cooperation with traceback requests, prohibition of illegal or fraudulent traffic, and appropriate notification or remediation when suspicious traffic is identified.

## **9. Mitigation and Enforcement Actions**

When suspected illegal or abusive robocall activity is identified, eGeniusCare LLC may take one or more of the following actions:

- investigate the source and nature of the traffic;
- suspend or terminate the affected customer or provider relationship;
- block specific telephone numbers, prefixes, destinations, or traffic patterns;
- notify relevant upstream or downstream providers;
- require corrective action or additional verification;
- cooperate with the FCC, law enforcement, and authorized traceback organizations; and
- implement additional technical or operational safeguards.

Mitigation actions will be documented and retained in accordance with applicable internal procedures and legal requirements.

## **10. Traceback Cooperation**

eGeniusCare LLC will cooperate with authorized traceback efforts, including requests from the Federal Communications Commission, law enforcement agencies, and the USTelecom Industry Traceback Group or other authorized traceback organizations.

The company commits to responding fully and within 24 hours to authorized traceback requests, subject to applicable law. Where legally permissible and reasonably available, eGeniusCare LLC will provide relevant call detail records, customer or account information, originating and downstream provider information, signaling or network information, and other information necessary to assist a legitimate traceback investigation.

## **11. DNC, TCPA, and Calling Compliance for Dialer Products**

For its predictive, auto, power, progressive, AI-powered, and other dialer products, eGeniusCare LLC will implement or require appropriate controls addressing applicable Do Not Call requirements, consent requirements, calling-hour restrictions, caller-ID requirements, and other applicable federal and state calling rules.

Customers remain responsible for ensuring that their campaigns and calling practices comply with applicable law and contractual requirements. eGeniusCare LLC may restrict, suspend, or terminate campaigns that present unlawful or prohibited activity.

## **12. Incident Response and Remediation**

Upon identification of suspected illegal robocall activity, eGeniusCare LLC will investigate the event, take appropriate containment measures, preserve relevant records, and implement additional safeguards where necessary.

Depending on the circumstances, the company may suspend or terminate the affected service, block traffic, notify relevant providers or authorities, and cooperate with traceback or enforcement inquiries.

## **13. Recordkeeping**

eGeniusCare LLC will maintain records demonstrating its compliance activities, including applicable customer onboarding and verification records, traffic monitoring and mitigation actions, provider due diligence, traceback responses, and material changes to its robocall mitigation practices. Records will be retained for periods consistent with applicable FCC requirements, other applicable law, and the company's internal compliance procedures.

#### **14. Annual Review and RMDB Updates**

eGeniusCare LLC will review this Robocall Mitigation Program periodically and update it when material changes occur to its services, network architecture, provider roles, company information, or STIR/SHAKEN status. The company will recertify and update its RMDB filing as required by applicable FCC rules.

#### **15. Designated Traceback and Mitigation Contact**

Name: Tanveer Javaid

Title: Chief Executive Officer

Company: eGeniusCare LLC

Phone: 213-769-2666

Email: tanveer@egeniuscare.com

Address: 10685-B Hazelhurst Dr. #41732, Houston, TX 77043

Traceback Response Time: Within 24 hours

#### **16. Certification and Declaration**

The undersigned certifies that the information contained in this Robocall Mitigation Program is true and correct to the best of the company's knowledge and that eGeniusCare LLC maintains a robocall mitigation program containing reasonable measures designed to prevent, detect, and mitigate illegal robocall traffic consistent with applicable FCC requirements.

eGeniusCare LLC has not implemented STIR/SHAKEN on its network as of the date of this filing. The company will update its RMDB filing when its STIR/SHAKEN implementation status materially changes.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Date: September 21, 2026