

Robocall Mitigation Plan

Shaaazford Global LLC (ShaaazPhone)

2011 Summerfield Pl, Sugar Land, TX 77478, USA

FCC Registration Number (FRN): 0038895397

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1. Who we are

Shaaazford Global LLC ("Shaaazford", "we") is a Texas limited liability company. We operate ShaaazPhone, a cloud business phone system and calling platform for businesses in the United States. ShaaazPhone provides phone numbers, outbound and inbound calling, a predictive and manual dialer, text messaging, call recording and transcription, delivered through our own softswitch and connected to the public telephone network through wholesale carriers. We also use ShaaazPhone for our own sales team's calls to business owners.

This plan describes the reasonable steps we take to avoid originating, carrying or processing illegal robocalls, as required by 47 C.F.R. §§ 64.6305 and 64.1200 and the Commission's related orders. It applies to all traffic on our platform: our own calls and the calls of every business customer.

1.1 Filing details

- **Provider role:** voice service provider, originating calls for our own use and for business customers.
- **Principals:** Muhammad Hamza Muhammad, Owner and sole officer.
- **Affiliates, subsidiaries and parent companies:** none.
- **Operating Company Number (OCN):** none at this time.
- **Prior enforcement:** Shaaazford and its principals have not been the subject of any FCC, state or federal law enforcement action related to illegal robocalls or spoofing.
- **Location:** Shaaazford is a United States company. Its operations, personnel and switching equipment are in the United States; it is not a foreign provider.

2. Our commitments

Shaaazford commits to:

1. take affirmative, effective measures to prevent new and renewing customers from using our network to originate illegal calls, including knowing our customers and exercising due diligence;
2. respond fully to every traceback request from the Commission, civil or criminal law enforcement, and the Industry Traceback Group within twenty-four (24) hours of receipt;
3. cooperate with the Commission, law enforcement and the Industry Traceback Group in investigating and stopping illegal robocallers that use our service;

4. promptly investigate any notice of suspected illegal traffic from the Commission's Enforcement Bureau and, where the traffic is illegal, stop it and report the steps taken within the time the notice requires;
5. not accept calls directly from any voice service provider that is not listed in the Robocall Mitigation Database;
6. keep this plan and our database certification accurate, update them within ten (10) business days of any material change, and recertify each year by March 1.

3. Knowing our customers

3.1 Before a customer can place calls or send messages

No customer account can place outbound calls or send messages until we have completed the following checks:

1. **Identity of the business:** legal business name, business address, Employer Identification Number, state of formation and registration details, website, and a business email address. We verify these against public business registration records and reject accounts we cannot verify.
2. **Identity of the people behind it:** the names and titles of the owners or officers and the person accepting our terms, with a working phone number and email address.
3. **Use case review:** a description of who the customer will contact (businesses, consumers or both), why, how often and at what volume; sample call scripts and message templates; and the source of its contact lists.
4. **Consent and do-not-call practices:** how the customer obtains and records consent; for customers contacting consumers, the customer's own National Do Not Call Registry Subscription Account Number (SAN) and any required state registrations.
5. **High-risk categories:** customers in categories with elevated robocall risk (including debt relief, credit repair, health insurance and Medicare, auto warranties, timeshares and travel, solar and home improvement lead generation, political calling, gambling and investment offers) are refused unless approved in writing after additional review of their consent records, scripts and lead sources.
6. **Signed obligations:** the customer must accept our Terms of Service and Acceptable Use Policy and sign a Compliance Certification, in which it accepts responsibility for the lawfulness of its calls, including consent, do-not-call compliance and caller ID accuracy, and agrees to answer traceback requests within 24 hours.

3.2 Limits on new accounts

New accounts start with conservative limits on concurrent calls, calls per second and daily volume, set according to the reviewed use case. We raise limits only after reviewing the account's traffic history. A new account is held in a pending state until it is approved, and cannot place calls or send messages in that state.

3.3 Renewing and existing customers

We repeat the review when a customer renews, materially changes its use case, adds a new line of business, requests higher limits, or when our monitoring (Section 5) or a complaint raises concern. We may require updated information at any time.

3.4 Our own calling

ShaaZford's own sales team is held to the same technical controls as customers (Section 4). Our own calls are live-agent business-to-business calls to contacts who have given consent. We do not place prerecorded or artificial-voice marketing calls.

4. Controls built into the platform

Every outbound call placed through the ShaaZPhone dialer passes through an automated compliance check before it is dialed. If a check cannot run or cannot reach its data, the call is blocked, not allowed. Every decision, including every allowed call, is written to an audit record, kept for at least four years, showing which checks ran and their results. The checks are:

1. **Calling hours:** calls are refused outside 8 a.m. to 9 p.m. in the called party's local time zone, determined from the contact record or the number.
2. **Internal do-not-call list:** every number is checked against the account's internal do-not-call list. Opt-out requests recorded by an agent (including requests made by calling the number given in our identification message), requests made by pressing 9 during our identification message, and opt-outs received by text message ("STOP") are added to that list and block all later calls.
3. **National Do Not Call Registry:** where an account is set to treat contacts as consumers, a contact is blocked unless the account has loaded registry data for that number's area code within the last 31 days and the number is not on the registry. ShaaZford's own calls are to business contacts that have given consent, so this check is not enabled on our own account; business customers calling consumers load registry data under their own Subscription Account Number. The same check can be applied to business contacts at an account's choice.
4. **Litigator list:** the platform maintains a litigator list per account, built from federal court records of lawsuits brought under the Telephone Consumer Protection Act, and blocks contacts that match it when the account has the check enabled. As at the date of this plan the list is still being assembled from court records and is not yet enabled on any account; it will be enabled once the data is complete and reviewed.
5. **Consent records:** contacts classified as consumers must carry a recorded consent source and date before the dialer will call them.
6. **Attempt limits:** each campaign has a maximum number of attempts per contact and a minimum interval between attempts, which the dialer cannot exceed.
7. **Abandoned calls:** answered calls are connected to a live agent within two seconds or receive a prerecorded identification message naming the business, giving a number to call to be added to the do-not-call list, and offering an automated opt-out: pressing 9 adds the number to the do-

not-call list immediately. Abandoned calls are counted per campaign, and dialing is automatically reduced when the abandonment rate approaches the legal limit.

8. **Caller ID:** the platform presents only numbers assigned to the customer's own account, validated as properly formatted North American numbers, so calls cannot present invalid, unallocated or unused numbers. Customers cannot enter arbitrary caller ID. An account may hold a small pool of local numbers so that a called business sees a number in its own area code; each number carries accurate caller name information, is used within a daily limit, and is taken out of service if it acquires a spam label. Numbers are not rotated to evade blocking or labelling, and a number taken out of service is not replaced to continue the same traffic.
9. **Prerecorded and artificial voice:** the platform does not provide prerecorded, artificial-voice or AI-voice outbound messages other than the identification message above. Our Acceptable Use Policy prohibits prerecorded, artificial-voice and AI-voice calls without the consent the law requires.
10. **Reassigned numbers:** a number is blocked when our calls show it has been disconnected or changed (immediately for a "number changed" or "does not exist" result; after failures on two different days for results that can also mean a temporary routing problem), or when an agent records that the wrong person answered. It stays blocked unless consent dated after the block is recorded. Consent older than 18 months is paused until it is confirmed again. Blocks can be cleared only with a recorded reason. Where an account checks the FCC's Reassigned Numbers Database, a result counts only if it was obtained after the Database's most recent monthly update.
11. **Account suspension:** we can suspend any account immediately, which stops all of its outbound calling and messaging.

Status on the date of this plan: controls 1, 2, 5, 6, 7, 8, 9, 10 and 11 are in force on every account that calls, including our own. Control 3 is in force for any account set to call consumers. Control 4 is built and being populated, as described above.

5. Monitoring traffic

We monitor each account's traffic for signs of illegal or abusive calling, including:

- sudden increases in call volume or calls per second;
- a high share of very short calls or unusually low answer rates;
- high numbers of calls blocked by the compliance checks in Section 4;
- abandonment rates approaching the legal limit;
- spam labelling of the account's numbers, and complaints from called parties, carriers or regulators;
- calling outside the use case approved in Section 3.

When monitoring shows a concern, we contact the customer, may reduce its limits or pause its traffic while we investigate, and require explanations and records such as consent evidence. If we find or

reasonably suspect illegal calling, we suspend the account, preserve the relevant records, and where appropriate report to the Commission or law enforcement.

6. Tracebacks, notices and cooperation

1. Traceback requests from the Industry Traceback Group, the Commission or law enforcement go to the robocall mitigation contact in Section 9, whose mailbox is monitored every day.
2. We identify the customer and call records for the traced call and respond fully within 24 hours.
3. We require the customer to respond to us within 24 hours with its consent records and the source of the called number, and we suspend the customer's calling while a traceback involving apparently illegal calls is open.
4. If the traceback shows the call was illegal, we terminate or restrict the customer as the facts warrant and record the outcome.
5. We act on notices of suspected illegal traffic from the Enforcement Bureau as described in Section 2.
6. We keep call detail records and compliance decision records for at least four (4) years so we can answer tracebacks and investigations.

7. Caller ID authentication (STIR/SHAKEN)

Shaaazford does not hold its own Service Provider Code (SPC) token or Operating Company Number, and therefore does not itself authenticate calls under the STIR/SHAKEN framework. We certify no STIR/SHAKEN implementation and rely on this Robocall Mitigation Plan, which applies in full to all traffic we originate.

Our outbound calls are carried by underlying wholesale carriers that are themselves listed in the Robocall Mitigation Database and that sign calls under their own STIR/SHAKEN credentials for the numbers they assign to us. We use only numbers assigned to our accounts with those carriers, so that the calls we originate can be signed and traced.

Before we originate calls for customers on our own softswitch at a carrier that does not sign them, we will obtain an Operating Company Number and an SPC token and implement STIR/SHAKEN authentication, directly or through a third-party authentication provider using our own token, and will update this plan and our certification within ten business days of that change.

8. Training, review and records

- Everyone at Shaaazford who handles customer onboarding, support or traffic operations is trained on this plan, our Acceptable Use Policy and the traceback process when they start and at least once a year.
- We review this plan at least once a year and whenever the law, our services or our carriers' requirements change.

- We keep records of customer verification, use-case approvals, monitoring actions, tracebacks and suspensions for at least four (4) years.

9. Robocall mitigation contact

- **Name:** Muhammad Hamza Muhammad
- **Title:** Owner
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- **Address:** 2011 Summerfield Pl, Sugar Land, TX 77478, USA
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- **Email:** info@shaazphone.com

This mailbox is monitored every business day, and traceback requests are answered within 24 hours of receipt.