

Robocall Mitigation Plan

Coastline CRM LLC

Effective September 21, 2026

1. Who we are and the voice service we provide

Coastline CRM LLC ("Coastline") provides cloud software that small and midsize businesses use to manage their customers, projects, scheduling, invoicing, and communications. Each business that uses Coastline has its own account, called a Workspace.

As optional add-ons, a Workspace can get a local United States phone number and use it for business texting, for forwarding incoming calls to a member's phone, and for an AI voice agent that answers incoming calls and places a limited set of outbound service calls on the business's behalf.

Coastline does not own or operate any network facilities. Every phone number used through Coastline is provided by our underlying carrier, Twilio, and every call is carried on Twilio's network. Each Workspace's number is held in its own Twilio subaccount under Coastline's Twilio account, so all traffic is attributable to a single identified Workspace.

2. STIR/SHAKEN status

Coastline certifies **No STIR/SHAKEN Implementation** and files as a voice service provider without a STIR/SHAKEN implementation obligation. Coastline does not hold an Operating Company Number or a Service Provider Code token, and it makes no attestation decisions.

Exemption. 47 CFR 64.6301(a) requires a voice service provider to implement STIR/SHAKEN in its own Internet Protocol networks. The Commission has clarified that its caller ID authentication rules do not apply to providers that lack control of the network infrastructure necessary to implement STIR/SHAKEN. Call Authentication Trust Anchor, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, 3260, para. 40 (2020). Coastline owns and operates no network facilities of any kind: no switches, session border controllers, trunks, or IP voice network. It therefore has no network in which to implement STIR/SHAKEN, and it performs the robocall mitigation described in this plan instead.

Calls placed through Coastline originate on Twilio's network from Twilio numbers assigned to the originating Workspace. Twilio is listed in the Robocall Mitigation Database as having complete STIR/SHAKEN implementation (Twilio US Technology, Inc., FRN 0028844892). Coastline accepts voice traffic only through Twilio.

Coastline does not allow caller ID spoofing. The caller ID on every outbound call is the originating Workspace's own assigned number, and the software offers no way to set a different caller ID.

3. Reasonable steps we take to avoid originating illegal robocalls

3.1 Know your customer

- Every Workspace is created by a named owner who signs in with a verified email address and must accept Coastline's Terms of Service.
- The Terms of Service prohibit using the service to place calls or send messages to recipients who have not consented to receive them, or in violation of the Telephone Consumer Protection Act or similar laws.
- Workspaces that use business texting complete carrier registration (10DLC), which collects and vets the business's legal name, employer identification number, address, and contact person.
- Calling is a paid, metered service billed to the Workspace, which ties calling activity to an identified paying customer.

3.2 Structural limits on outbound calling

These limits are enforced by Coastline's servers on every call attempt. A Workspace cannot turn them off.

- **No arbitrary dialing.** The AI voice agent can only call a phone number already on file for an existing contact in the Workspace's own records. Neither the Workspace nor the AI can enter or generate a free-form number to dial. The one exception is a test call, which rings the signed-in member's own phone.
- **Tied to an existing business record.** Every outbound call must be linked to an existing appointment, invoice, or project in the Workspace. The product has no list upload, campaign dialer, or bulk calling feature. It is built for service calls about existing customer relationships, such as appointment reminders, follow-ups on existing requests, and invoice reminders.
- **Volume caps per Workspace.** No more than 2 call attempts per second, 10 simultaneous calls, and 300 outbound calls per day. Workspaces on the Professional plan receive double these limits.
- **Fixed caller ID.** Outbound calls always display the Workspace's own assigned number, as described in section 2.

3.3 Disclosure and opt-out

- Every AI call, inbound and outbound, opens by stating that the caller is an AI assistant, naming the business it calls for, and stating that the call may be recorded. A Workspace can customize what follows this opening but cannot remove it.
- If the person on the call asks not to be called again, the AI confirms the request and records a do-not-call flag on that contact. From that moment, Coastline's servers refuse every further AI call to that contact.
- When an outbound call reaches voicemail, it leaves a short message that names the business, states the reason for the call, and gives a number to call back.

3.4 Monitoring and enforcement

- Every call is logged with its time, originating and destination numbers, duration, and outcome. AI calls also keep a summary and transcript, so the purpose and content of any call can be reviewed.

- Coastline investigates any complaint or report of unwanted or illegal calls. Complaints can be sent to support@coastlinecrm.com.
- Coastline can pause or turn off calling for any Workspace immediately, and will suspend or terminate a Workspace that violates its Terms of Service or applicable law.

4. Traceback commitment

Coastline commits to respond fully, and within 24 hours, to every traceback request from the Federal Communications Commission, from civil and criminal law enforcement agencies, and from the industry traceback consortium. Coastline will identify the Workspace that originated the traced call and provide the call records it holds.

5. Cooperation with law enforcement

Coastline commits to cooperate with the Federal Communications Commission, law enforcement agencies, and the industry traceback consortium in investigating and stopping any illegal robocaller that uses Coastline's service to originate calls.

6. Enforcement history

In the two years before this filing, Coastline has not been the subject of any formal action or investigation by the Federal Communications Commission, a law enforcement agency, or a regulatory agency relating to illegal robocalls or spoofed calls.

7. Robocall mitigation contact

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8. Principals, affiliates, subsidiaries, and parent companies

Principal: Austin DeBerry, Founder and CEO. Coastline CRM LLC has no parent company, subsidiaries, or affiliates, and holds no other FRN.