

PitchWhip Ltd - Robocall Mitigation Program

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1. Who we are and what we provide

PitchWhip Ltd is a private limited company registered in England and Wales (company number 17389184). We sell a sales-productivity tool for business users: a browser extension and web portal that help sales staff research prospects and make one-to-one business telephone calls. Calling is one feature of the product. We make calling available only to business customers after the Director's manual review described in section 4.

Our users are sales staff based in the United Kingdom. They call business prospects.

We identify as a foreign voice service provider because we provide voice service to users outside the United States that can terminate in the United States (47 CFR 64.6300(c)). We also intend to serve users located in the United States. This program covers all calls we originate, wherever the user is.

Human principal: Kurendeeep Rai, Director. Affiliates: none. Subsidiaries: none. Parent companies: none. PitchWhip Ltd has had no other name.

2. STIR/SHAKEN

Certification. We have not implemented the STIR/SHAKEN authentication framework on any portion of a network (47 CFR 64.6305(d)(1)(iii)). We are a voice service provider without a STIR/SHAKEN implementation obligation (64.6305(d)(4)(vi)(C)).

Why. We are unable to implement STIR/SHAKEN because we lack control over the network infrastructure necessary to implement it (64.6305(d)(2)(i)). We do not own, lease or operate any switch, session border controller, router or other voice network element. Our software runs on general-purpose cloud hosting. For each call, it asks our underlying carrier, Twilio Inc., to place the call through Twilio's programmable voice interface. Twilio's own IP network originates the call and hands it to the called party's provider. We are a user of Twilio's network, not an operator of it. We do not claim the extension for providers unable to obtain an SPC token (64.6304(b)).

As to our users outside the United States, we are also a foreign voice service provider, which is not required to implement STIR/SHAKEN.

If our arrangement changes so that we control network infrastructure on which STIR/SHAKEN can be implemented, we will obtain an SPC token and implement STIR/SHAKEN directly, or through a third-party authentication service using our own certificate under 64.6301(b), and we will update this filing within 10 business days.

How our calls are authenticated today (for information, not as the basis above). For calls to the United States, Twilio signs the calls it originates for us with its own certificate. The attestation it gives depends on what it knows about us and the caller ID. Our business profile is approved in Twilio's customer-verification system. Our approved SHAKEN/STIR registration is linked to our approved primary business profile. Calls to the United States that present a customer's verified caller ID receive partial (B-level) attestation, which is the highest level Twilio gives to a number it did not issue.

3. Every call is placed by a person, one number at a time

- A user starts every call by pressing Call for one number. There is no automatic, predictive, power, progressive or sequential dialling. When a user works through a call list, moving to the next person is a separate manual press, and the call itself is another press. Nothing advances or dials on its own.

- There is no answering-machine detection, no voicemail drop, and no prerecorded or artificial-voice message, with one exception: a one-sentence automated notice, played to the called party when the call is answered, stating that the call is, or may be, recorded. It is off by default for every new account. An account's administrator may turn it on for the account or require it on every call, and a user may turn it on for a single call. Telling the called party that a call is recorded is the customer's responsibility under our terms.
- Speech features in the product (live transcription, coaching prompts to the user, and call notes written after the call) are shown only to our user. Nothing they produce is played to the called party.

4. Knowing our customers (47 CFR 64.1200(n)(4))

Calling is off for every new account. An account cannot switch calling on for itself. The Director reviews each business customer by hand before switching calling on, and keeps a written record of each review. The review covers:

1. a paid business subscription in the customer's company name;
2. the company's existence and status on its official register (Companies House for UK companies; the relevant state business register for US companies), and that the name and address match what the customer gave us;
3. the company website, and that the account administrator's work email uses the company's domain;
4. what the customer will use calling for, in writing: one-to-one calls by its own sales staff to business prospects;
5. the caller ID (section 5);
6. the administrator's confirmation, recorded in our system, that the customer screens its call lists against the do-not-call registers that apply to it (section 7).

Calls to US and Canadian numbers are a separate permission. Even after calling is switched on, an account cannot call a +1 number until the Director switches that on for it individually.

We refuse or end service to a customer we reasonably believe is using it to make illegal calls. Our terms allow us to suspend or terminate access, with notice where practical, for a material breach or legal or security risk. They also allow calling to be suspended separately where we reasonably believe the calling rules are being broken, where a carrier or regulator asks us to, or to protect the people being called.

5. Caller ID: only verified numbers, one account per number

- Each account presents one caller ID on its calls. It must be a number the customer controls, verified by our carrier's verification call: the carrier rings the number and the call must be answered and a code entered. The Director completes this with the customer before calling is switched on.
- A number verified for one account cannot be used by any other account.
- A caller ID that is not on our verified list cannot be presented. This works as an allow-list: invalid numbers, numbers not allocated to any provider, and unused numbers cannot answer a verification call and so cannot be used. If the subscriber to a number asks us to treat it as inbound-only, we remove it from the list and refuse it (47 CFR 64.1200(o)).

6. Volume limits

Before every call our servers apply daily limits per user, per account, and per called number (across all of our customers), and a limit for the whole service. A call that would exceed a limit is refused before it is placed. The limits are set well above normal one-to-one sales calling.

7. Do-not-call and calling hours

- Each account keeps a do-not-call list. Our servers check it before every call; if the list cannot be read, the call is refused. A number that a customer's team has marked "do not call" cannot be dialled by that team.
- Before calling is switched on, the account administrator must confirm that the customer screens its lists against the national do-not-call registers that apply to it. Without that confirmation no call can be placed.
- For calls started from a call list, the called person's local time is checked. Our servers do not offer a US or Canadian number from a call list outside 8:00 a.m. to 9:00 p.m. in the called person's local time, and our software will not place the list call if that window has closed by the time the user presses Call. Where a number's time zone is not known, the call must fall inside those hours in every mainland time zone the number could be in.

8. Monitoring, analytics and action

- We do not use a third-party call-analytics vendor. Our underlying carrier, Twilio Inc., blocks outbound calls whose caller ID is on a do-not-originate list, and inbound calls claiming to come from such numbers (47 CFR 64.1200(o)), and passes industry traceback requests about our traffic to us.
- The Director reviews each calling account's call volumes, answer rates and patterns of very short calls every month.
- If a pattern suggests abuse, or we receive a complaint, a traceback request or a notice from the Commission, we suspend calling for the account while we investigate. We end service to any customer we find making illegal calls.
- We act on any Notice of Suspected Illegal Traffic from the Commission within the time it sets.

9. Upstream providers

We do not accept calls from other voice service providers or intermediate providers for onward carriage. All calls we originate come from our own business customers' users. We send every call through one underlying carrier, Twilio Inc., which is listed in the Robocall Mitigation Database.

10. Traceback and cooperation

We commit to respond fully within 24 hours to all traceback requests from the Commission, law enforcement and the industry traceback consortium, and to cooperate with them in investigating and stopping any illegal robocaller that uses our service to originate calls.

For each call, our carrier's records hold the calling and called numbers, the start time and the duration, and are available to us for 13 months. Our own records link each call to the customer account and user who placed it for as long as the customer's subscription is active.

Traceback and robocall-mitigation contact:

Kurendeeep Rai, Director, PitchWhip Ltd

96a Wandsworth Bridge Road, London SW6 2TF, United Kingdom

Telephone: +1 628 298 5777

Email: hello@pitchwhip.com

Business hours: 8:00 a.m. to 5:30 p.m. UK time, Monday to Friday. The contact mailbox is checked every day, including outside those hours and when the Director is travelling (or an alert on it is watched), so a request received at any time is seen the same day.

11. Enforcement history

In the prior two years, neither PitchWhip Ltd nor any entity with which it shares common ownership, management, directors or control has been the subject of a formal Commission, law enforcement or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

12. Updates

We will update this filing within 10 business days of any change to the information in it, and recertify it each year on or before March 1.

Certified by: Kurendeeep Rai, Director, PitchWhip Ltd, 29 September 2026.

Signed in accordance with 47 CFR 1.16.