

NoNotes Inc. Robocall Mitigation Plan

Company	NoNotes Inc.
FCC Registration Number	0038969416
Registered office	212 Wilshire Ave, Ottawa, ON K2C 0E5, Canada
Mailing address for robocall matters	301-2301 Carling Ave, Ottawa, ON K2B 7G3, Canada
Robocall contact	Shen-Han Lin, Chief Operating Officer, +1 888 234 9325 ext. 700, cliff@nonotes.com
Version	1.0, October 3, 2026

1. Overview

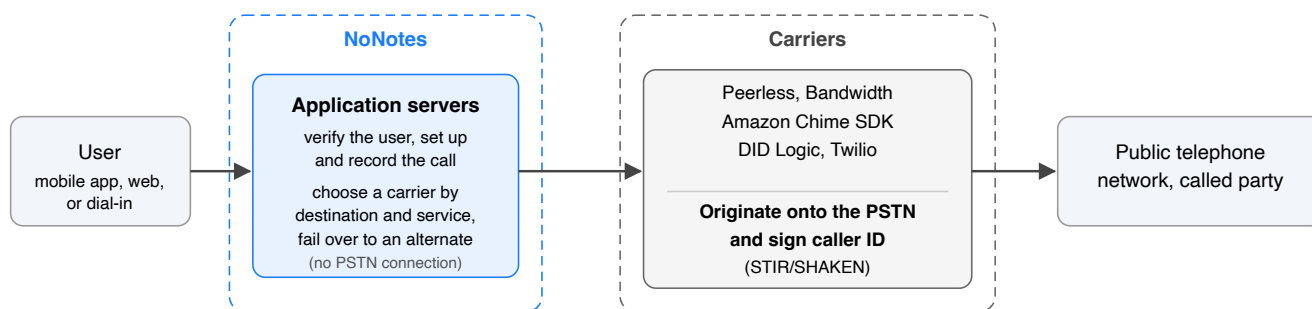
NoNotes Inc. (“NoNotes”) provides a call recording service to individual and business users through a mobile application, a web application, and dial-in access numbers. Enterprise customers may also receive dedicated access numbers for their organization. NoNotes connects a user’s call to the party the user chooses and records the conversation for the user. NoNotes is a voice service provider and a foreign voice service provider (incorporated in Canada) for the purposes of the Commission’s rules.

NoNotes does not offer bulk, marketing or prerecorded-message calling. Every outbound call is placed by an individual user, one call at a time, to a party the user chooses, except a transfer of an incoming call described below. NoNotes offers no API, SIP trunking, SIP registration or dialing platform to customers, and does not carry traffic for other providers.

NoNotes also provides business telephone services to business customers it approves. Calls to telephone numbers that NoNotes assigns to the business are answered by NoNotes’s automated receptionist and, at the caller’s request, transferred only to the business’s own registered members. A transfer call to a member presents the NoNotes-assigned number and is placed only because of the incoming call.

2. STIR/SHAKEN implementation

NoNotes certifies **No STIR/SHAKEN Implementation**, because it lacks control of the network infrastructure necessary to implement STIR/SHAKEN (Call Authentication Trust Anchor, First Report and Order, 35 FCC Rcd 3241, para. 40; Eighth Caller ID Authentication Order, FCC 24-120, para. 18 and n.82).



Every NoNotes call enters the public telephone network through a carrier, which authenticates it.

Facts specific to NoNotes:

- NoNotes operates application servers that set up and record its users' calls. It does not own, lease or operate connections to end users, does not interconnect with the public switched telephone network, and does not hold numbering resources directly; it leases telephone numbers from its carriers.
- Every NoNotes call reaches the public switched telephone network through one of its carriers, which originates the call onto the network: Peerless Network, Bandwidth Inc., Amazon Web Services, Inc. (Amazon Chime SDK), DID Logic, Inc. and Twilio Inc. Each authenticates the caller ID of calls it originates under its own STIR/SHAKEN obligation. NoNotes selects the carrier for each call by destination and service, and fails over to an alternate carrier when a carrier cannot complete the call.
- NoNotes does not hold an OCN or SPC token. If NoNotes's role changes so that it controls network infrastructure necessary to implement STIR/SHAKEN, it will implement STIR/SHAKEN and update this filing.

3. Know your customer

Account creation. Each account is tied to the user's own telephone number. Most mobile users subscribe through in-app purchase in the Apple App Store, where Apple applies its own payment and fraud controls. Other payments are processed by Stripe, whose fraud screening reviews card payments.

Telephone number verification.

- Mobile application: every recorded call begins with NoNotes calling the user's registered telephone number. The other party is dialed only after the user answers that call. This verifies, on every call, that the user has the telephone number that will be presented as caller ID.
- Web application: calls can be placed only from telephone numbers the user has verified with a one-time code sent by SMS or delivered by voice call.
- Dial-in access numbers: the user is identified by calling from their registered telephone number, or by entering their registered telephone number and a 6-digit PIN.
- Enterprise access numbers: usable only by NoNotes accounts that belong to that enterprise customer, identified by their NoNotes user ID.

Caller ID. Outbound calls present the user's own registered telephone number, or a number NoNotes assigned. Users cannot enter an arbitrary caller ID. Users may withhold caller ID (*67).

Free accounts. Free accounts are limited in minutes, call frequency and destination countries.

4. Monitoring and investigation

NoNotes operates an abuse prevention system that it continually refines as fraud patterns evolve, which includes:

- automated alerts that notify NoNotes when outbound call volume exceeds normal levels;
- blocklists of destination telephone numbers, IP addresses and, for free accounts, countries;
- checks before each mobile application call that the telephone number belongs to the user's account and that the account has no unpaid invoices;
- minute and call-frequency limits on free accounts;
- country restrictions, spending limits and volume alarms on verification text messages.

In addition:

- NoNotes reviews, at least monthly, the per-day traffic analytics provided by its carriers, including call volume, answer rate, average call length and the carrier's robocall risk score, together with its own user activity reports and failed-call logs.
- When activity is unusual for an account (volume, destinations, very short calls, complaints), NoNotes reviews the account's call records, contacts the user to confirm the use case, and suspends or terminates the account when it finds a violation of its Terms of Service.
- NoNotes cooperates with its carriers on any abuse report and acts on it promptly.

5. Terms of Service

Users must agree to NoNotes's Terms of Service, which require lawful use of the service, prohibit unlawful, harassing or abusive use, require users to comply with call recording laws, require that users have the right to use their registered telephone numbers, and allow NoNotes to suspend or terminate accounts for violations.

6. Traceback and cooperation

NoNotes will respond to traceback requests from the Commission, law enforcement and the Industry Traceback Group within 24 hours, and will cooperate in investigating and stopping any illegal calls that use its service. Requests go to the robocall contact above.

7. Public safety

NoNotes does not block calls from public safety answering points or government emergency numbers.

8. Carriers and other providers

NoNotes does not accept calls from other voice service providers for transmission, and sends its users' calls only to the carriers named in section 2.

9. Prior actions

In the prior two years, NoNotes has not 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.

10. Certification details

- Business name and address: NoNotes Inc., 212 Wilshire Ave, Ottawa, ON K2C 0E5, Canada.
- Other business names in use: none. Previous business names: none.
- Owners of more than 10%: 13167895 Canada Inc. (wholly owned by Shen-Han Lin).
- Officers and directors: Shen-Han Lin, Chief Operating Officer and Director; Jessica Acker, Director; Vincent Tran, Director.
- Parent, subsidiaries and affiliates: none.
- Role in the call chain: voice service provider serving end users; foreign voice service provider.
- OCN: none.

11. Plan updates

NoNotes will update this plan and its Robocall Mitigation Database filing within ten business days of any material change, and will recertify annually by March 1.

Version	Date	Change
1.0	October 3, 2026	Initial filing