

# Spark OS LLC: Robocall Mitigation Plan

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## Company and services

Spark OS LLC (FRN 0038970836, Scottsdale, Arizona) runs Spark, a CRM and calling platform for licensed insurance agents. Agents use it to call their own leads and clients and to receive inbound calls on local numbers.

Calls are placed by an agent who is present on the call. This includes agent-attended dialing of up to 3 lines at once, where the first person to answer is connected to the agent.

Spark's calls are carried today by Twilio. Spark is moving call origination onto its own SIP platform, with Flowroute and Twilio as underlying carriers. Spark does not offer wholesale termination, resale to other carriers, or international calling.

## Know your customer

Spark sells only to insurance agents and agencies, on a paid subscription with a verified payment method. Calling is blocked unless the subscription is active and the customer has prepaid call credit.

- Each customer account is tied to a named business owner, a billing record and a payment card.
- Customers can call only from phone numbers Spark has provisioned to their account.
- Before a customer can text, their business identity is verified through carrier brand registration (A2P 10DLC).
- **Planned before launch on Spark's own network:** verify the agent's state insurance license before calling is enabled.

## Calling controls

Every call passes Spark's server-side checks before it is placed. Customers cannot bypass the do-not-call or destination checks.

| Control         | How it works today                                                                                                                                                                                                 |
|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Do-not-call     | Every dial is checked against the customer's do-not-call list. If the check fails, the call is blocked.                                                                                                            |
| Opt-out capture | Numbers are added to do-not-call from a keypress on the abandoned-call message, texted opt-out words, agent dispositions and the AI agent's in-call opt-out.                                                       |
| Calling hours   | 8am–9pm in the called party's local time, by contact time zone, then area code. Enforced automatically for multi-line and AI calls. Single-line agents get a warning.                                              |
| Abandoned calls | Multi-line dialing is capped at 3% abandoned calls over a rolling 30 days, measured on live answers. Lines are halved above 2.5%, and dialing pauses at 3%. Abandoned calls get a message with a keypress opt-out. |
| Ring time       | Calls ring 15–60 seconds (default 30).                                                                                                                                                                             |
| Destinations    | US, Canada, US territories and toll-free only. Premium-rate (900/976), non-geographic and Caribbean area codes are blocked. International calling is off.                                                          |
| Concurrency     | At most 3 lines at once per agent. AI calls are capped per campaign and per account.                                                                                                                               |
| AI-voice calls  | Before launching, the customer must attest to prior express written consent. The AI identifies itself as an AI assistant calling for the agency.                                                                   |

### Planned before launch on Spark's own network:

- Scrub against the National Do Not Call Registry.
- An abandoned-call message that names the business and gives a callback number.
- Calling hours enforced on every call, with no agent override.

## Caller ID and STIR/SHAKEN

Spark does not allow caller ID spoofing. Every call shows a number Spark has provisioned to the calling customer's account.

- Spark's server sets the caller ID. Customers cannot enter or override an outbound caller ID, and Spark accepts no outside caller IDs.
- Spark does not yet hold its own STIR/SHAKEN certificate. Calls are signed by the carrier that owns the calling number: Flowroute for Flowroute numbers, Twilio for Twilio numbers.
- Spark never sends a number through a carrier that does not own it, so signing stays with the owning carrier.
- Spark prepares Free Caller Registry submissions for customer numbers. Caller name (CNAM) is registered per customer.

## Monitoring and enforcement

Spark monitors every customer number daily and can stop a customer's calling when it finds abuse.

- A daily job checks each number's spam reputation (Nomorobo), answer rate and opt-out rate.
- Spark keeps a record of every call: time, numbers, duration, outcome and the customer account that placed it.
- Spark investigates complaints, carrier notices and traceback requests within 24 hours.
- If a customer is found making illegal or unwanted robocalls, Spark suspends that customer's calling and texting and may close the account.
- **Planned before launch on Spark's own network:** an automatic per-customer calling suspension, triggered by abuse signals or by staff.

## Traceback and contact

Spark answers traceback requests from the Industry Traceback Group, carriers and law enforcement within 24 hours. Spark identifies the customer that placed the call and acts on the result.

- Spark cooperates fully with FCC, FTC and state enforcement and with industry traceback efforts.

- Spark will update this filing within 10 business days of any change and recertify every year by March 1.

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