

ROBOCALL MITIGATION PLAN of VOXIE, INC.

Prepared for FCC Robocall Mitigation Database Filing

Company: Voxie, Inc.

Effective Date: October 6, 2026.

FCC Registration #: 0038960019

Filing Type: Initial Filing

Provider Role for RMD Filing: Voice Service Provider (non-facilities-based; filed conservatively in light of Bandwidth carrier-level requirements).

STIR/SHAKEN Status: No independent implementation; Voxie lacks control over the IP-based voice network infrastructure necessary to implement STIR/SHAKEN and does not own, or lease and operate, such infrastructure. See Call Authentication Trust Anchor, First Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3247, 3260 ¶ 40 (2020); see also 47 C.F.R. § 64.6305(d)(2)(i). Network-level caller-ID authentication for calls carried by Voxie's underlying carriers is performed on those carriers' networks under their respective STIR/SHAKEN implementations.

This document constitutes Voxie, Inc.'s Robocall Mitigation Plan for purposes of 47 C.F.R. § 64.6305 and Voxie's filing in the FCC's Robocall Mitigation Database ("RMD"). This Plan describes Voxie's current production voice functionality and the robocall mitigation measures currently existing within Voxie's technical and practical control. Voxie's filing is intended to satisfy applicable FCC requirements, along with its contractual obligations to Bandwidth, without expanding the nature or scope of Voxie's voice services beyond the functions described below.

Voxie understands that "combatting the scourge of illegal robocalls" remains the FCC's top consumer protection priority, and that robocalls are responsible for the majority of consumer protection complaints fielded by the Agency. Voxie is committed to transparency, to knowing its customers, and to not providing services to brands which violate the law.

I. Company Overview & Service Description

Voxie, Inc. ("Voxie") is principally a software-as-a-service ("SaaS") technology platform for franchise and multi-location brands. Voxie's core product is SMS and MMS messaging. To a minor extent, Voxie also handles inbound voice calls placed to the telephone numbers it provisions for customers' messaging programs. Voxie contracts at the brand level through a negotiated sales process and signed, written agreements. Voxie does *not* offer any anonymous or self-service account activations. All voice telephone numbers are provisioned manually by Voxie personnel.

Voice is an ancillary feature associated with Voxie's messaging product, not Voxie's primary business. Numbers provisioned for a customer's messaging program can also receive inbound calls. Voxie's application answers each inbound call with one of a small set of behaviours configured for the number. By default it plays an announcement that the number does not accept calls. Where a customer asks for forwarding, Voxie personnel record a destination, typically the customer's existing business line, and the application instructs the carrier to forward each call there, sending touch-tone digits after answer where an extension is required.

Voxie obtains telephone numbers and underlying voice services from two registered U.S. carriers, Twilio Inc. (“Twilio”) and Bandwidth Inc. (“Bandwidth”), each with its own Robocall Mitigation Database filing and STIR/SHAKEN implementation. Voxie is currently migrating numbers from Twilio to Bandwidth; during that migration, a number’s messaging may be carried by Bandwidth, while its voice calls remain with Twilio. Voxie’s agreement with Bandwidth identifies Bandwidth as the service provider for regulated U.S. services and authorizes Voxie to make Bandwidth services available to Voxie’s customers and end-users. Voxie is responsible under that agreement for compliance applicable to its use and resale of the services, for maintaining accurate end-user information, and for requiring customers and end users to comply with materially similar requirements.

Voxie’s current production platform does not expose a customer-facing capability to initiate outbound voice calls, does not provide predictive or bulk outbound dialing, and does not operate an autodialer for voice calls. Voxie has entered into Bandwidth order forms or amendments that make additional voice functionality, including Outbound Calling and Voice API functionality, contractually available. Those contractual service entitlements do not change the current production functionality described in this Plan. Voxie will review and update its RMD filing and this Plan as required before or when a material change in its production voice functionality occurs.

II. STIR/SHAKEN Implementation & Underlying Carrier Functions

Voxie does not independently implement the STIR/SHAKEN caller-ID authentication framework because it lacks control over the network infrastructure necessary to do so. The Commission has recognized that voice service providers lacking control over the network infrastructure necessary to implement STIR/SHAKEN are not subject to the STIR/SHAKEN implementation requirement. See Call Authentication Trust Anchor, First Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3247, 3260 ¶ 40 (2020); see also 47 C.F.R. § 64.6305(d)(2)(i).

Voxie is a non-facilities-based provider. It does not own, or lease and operate, the IP-based voice network infrastructure on which STIR/SHAKEN could be installed and implemented. In particular, Voxie does not own or control the carrier switching, session-border, signaling, certificate, or other network infrastructure through which caller-ID authentication is performed. Voxie instead purchases underlying voice services from Twilio and Bandwidth. Accordingly, Voxie lacks the technical and operational control over the relevant network infrastructure necessary for Voxie itself to implement STIR/SHAKEN.

Network-level call transport and caller-ID authentication for traffic carried on Twilio’s and Bandwidth’s networks are performed by the applicable carrier under its own STIR/SHAKEN implementation and RMD filing. Voxie does not rely on that carrier authentication, or on its lack of an SPC token or STIR/SHAKEN certificate, as the legal basis for its exemption. Rather, those facts reflect the underlying network architecture giving rise to Voxie’s lack of control over the infrastructure necessary for independent implementation. Voxie’s RMD certification will identify that lack of control as the basis for its implementation status and will accurately describe the limited, non-facilities-based nature of Voxie’s role.

When Voxie’s application instructs a carrier to forward a call, the carrier originates the forwarded leg. Voxie does not set or alter the caller ID on that leg; the carrier presents the

original caller's number, as in conventional call forwarding, and applies its own attestation to it. Voxie does not currently permit customers to choose a caller ID.

Voxie maintains records identifying its underlying carrier relationships and will cooperate with Bandwidth and other applicable carriers regarding caller-ID authentication, traceback, blocking, and mitigation issues. If Voxie introduces production functionality under which its application originates calls, or obtains signing credentials, Voxie will evaluate and implement the required technical and filing changes and update this Plan at that time.

III. Robocall Mitigation Program

A. Customer Onboarding & Contractual Controls

Voxie uses a contracted, business-to-business onboarding model. Before production services are activated, the customer enters into a Master Services Agreement and/or Statement of Work and is subject to Voxie's applicable Terms of Service and Acceptable Use Policy. Voxie does not offer anonymous or self-service signup. Provisioning is performed by Voxie personnel.

Voxie's customer terms prohibit unlawful use of the platform and require compliance with applicable communications, telemarketing, consumer-protection, and other laws. Voxie also maintains the contractual ability to restrict, suspend, or terminate service for unlawful, fraudulent, abusive, or otherwise prohibited use. These controls are intended to flow through, as applicable, the compliance obligations Voxie undertakes in its Bandwidth reseller relationship.

B. Know-Your-Customer ("KYC") Measures

Voxie applies KYC measures that are reasonable and proportionate to its business model and current voice call-handling functionality. Voxie contracts with the franchise or multi-location brand that is its customer, rather than separately contracting with each individual franchise location operating under that brand. Before service activation, Voxie obtains and maintains identifying and contact information for the contracting customer, including its legal business name, business address, website, authorized signatory or administrative contact, and intended use case(s).

For messaging campaign registration, Voxie collects the contracting customer's EIN and related business information and submits applicable brand and campaign information for third-party vetting, including through industry registration processes. This brand-level vetting should not be understood as a representation that Voxie separately obtains or independently verifies an EIN for every individual franchise location. Voxie associates provisioned telephone numbers and locations with the applicable contracted customer account and maintains records sufficient to quickly and accurately identify the customer/user responsible for the number and configuration.

Voxie does not knowingly activate voice functionality for an anonymous or unverifiable contracting customer/user. Where information is incomplete, inconsistent, or raises a material compliance concern, Voxie may request additional information, delay provisioning, restrict functionality, or decline or terminate service.

C. Technical Scope & Constraints

Voxie's current production voice functionality is designed principally to receive and route inbound calls. Customers do not have a self-service interface or API through Voxie's production platform that permits them to launch outbound calling campaigns. Forwarding

destinations and related routing configurations are established or changed through controlled Voxie processes rather than through anonymous public access.

For each inbound call, the carrier delivers the call to Voxie's application, which returns a routing instruction for that call: forward the call to the destination recorded for the number (and, if configured, send touch-tone digits to reach an extension) or play an announcement. The carrier sets up and carries the call and any forwarded leg on its own network; Voxie's application carries no call media and does not operate the carrier network. Voxie will treat any expansion beyond these current inbound and call-forwarding use cases as a material operational change requiring compliance review.

D. Traffic Monitoring, Records, & Anomaly Review

Because Voxie does not operate the underlying carrier network and its current voice use case is predominantly inbound, Voxie does not claim to operate carrier-level robocall analytics or blocking systems. Instead, Voxie uses the records and controls reasonably available to it, including:

1. Carrier call-detail and related records made available to Voxie for investigation, compliance review, and traceback response;
2. Records associating provisioned numbers, customer accounts, forwarding destinations, and configuration changes;
3. Review of customer complaints, carrier notices, law-enforcement or regulatory inquiries, Industry Traceback Group requests, and other reports of suspected unlawful or fraudulent activity; and
4. Coordination with Twilio and Bandwidth regarding network-level fraud detection, authentication, blocking, and traffic controls that are performed on the telephone carrier network.

Voxie will investigate material anomalies or credible reports of misuse within the scope of information reasonably available to it and will take appropriate action, which may include obtaining additional customer information, changing or disabling routing, suspending service, terminating service, or escalating the matter to the underlying carrier or appropriate authority.

E. Upstream/Underlying Provider Review

Voxie uses established underlying providers for voice transport and related network functions. Voxie's voice traffic is carried by Twilio and Bandwidth, both registered providers with their own RMD filings and STIR/SHAKEN implementations. For traffic carried by either, Voxie relies on that carrier for the carrier-network functions that Voxie cannot itself perform, including network-level STIR/SHAKEN authentication and carrier traffic controls. Voxie will maintain information concerning its underlying providers and will periodically confirm, as reasonably appropriate, their RMD status and the scope of the functions on which Voxie relies. Voxie accepts no voice traffic from any other provider, and customer-owned numbers that Voxie hosts for messaging remain with the customer's own carrier for voice.

F. Enforcement & Fraud Response

Voxie reserves and will exercise appropriate rights to restrict, suspend, or terminate a customer or affected functionality when Voxie identifies unlawful, fraudulent, abusive, or prohibited use. Consistent with its Bandwidth agreement, if Voxie suspects or learns of fraudulent use of Bandwidth services, Voxie will promptly take steps to stop or cause the

affected use to stop and notify Bandwidth, as appropriate. Voxie will cooperate with Bandwidth and any other then-current carrier partners, in responding to unusual traffic patterns, suspected fraud, and compliance issues.

IV. Affirmative Measures to Prevent Illegal Calling

Voxie's affirmative measures are designed around the functions it actually provides and controls. These measures include contracted business onboarding; brand-level identity and campaign vetting; manual provisioning of phone numbers; association of telephone numbers and routing configurations with identifiable customer accounts; contractual prohibitions on unlawful use; controlled changes to forwarding destinations; review of complaints and carrier or government notices; and suspension or termination of the customer or of the affected functionality when appropriate. Voxie's present production design does not provide customers with outbound bulk-dialing or robocall functionality.

Voxie will review these measures when onboarding or renewing customers and when introducing any materially different voice functionality. Voxie will not rely solely on a customer's contractual promise of compliance where facts known to Voxie still create a material reason to investigate possible illegal conduct or other misuse.

V. Traceback, Law-Enforcement, & Carrier Cooperation

Voxie will cooperate in good faith with the FCC, law-enforcement agencies, the registered Industry Traceback Group ("ITG"), Bandwidth, and other applicable carriers in investigating suspected unlawful calls. Voxie will respond promptly to traceback and related requests and will use commercially reasonable efforts to provide responsive information within 24 hours when requested or required. This commitment is also consistent with Voxie's Bandwidth agreement, which may require Voxie to provide information necessary for Bandwidth to respond to a lawful request or inquiry within 24 hours.

Designated contact for traceback, carrier, and compliance inquiries:

Name: Tim Hitchner
Title: VP of Product
Email: tim.hitchner@voxiechat.com
Phone: +1 517-581-4451

Voxie maintains internal records of number assignments and forwarding configuration information in its systems and intends to retain those records for so long as reasonably necessary to support customer operations, compliance, and traceback response. Carrier call-detail records ("CDRs") are retained or made available subject to the underlying carrier's applicable retention practices. Voxie will preserve records relevant to a known investigation, traceback, dispute, or legal hold notwithstanding an otherwise applicable retention period.

VI. Prior Enforcement Actions & Investigations

To Voxie's knowledge, during the two-year period preceding this filing, neither Voxie nor any entity required to be reported with Voxie in the RMD has been the subject of an FCC or other governmental or regulatory enforcement action, citation, notice of apparent liability, or formal governmental investigation concerning illegal robocalling, caller-ID authentication, or RMD compliance. This statement addresses governmental and regulatory actions required to be disclosed in the RMD and is not intended to address private civil litigation.

VII. Filing Maintenance & Annual Recertification

Voxie will maintain its RMD filing in accordance with 47 C.F.R. § 64.6305, including annual recertification by March 1, and timely updates when information required in the RMD materially changes.

Voxie will closely monitor the FCC's proposed STIR/SHAKEN- and RMD-related rules published in 2026. See 91 Fed. Reg. 42602 (July 9, 2026) (proposing amendments to 47 C.F.R. pts. 1, 64); 91 Fed. Reg. 57454 (Sept. 9, 2026) (proposing amendments to 47 C.F.R. pts. 0, 1, 64).

VIII. Principals, Affiliates, Subsidiaries, Parent Companies, & Other Business Names

Voxie will report in its RMD filing the principals and any parent companies, subsidiaries, or affiliates required by the FCC's current filing instructions and definitions. At least one natural-person principal will be identified.

Principal: Adam Waid, Chief Executive Officer.

Parent companies/subsidiaries and corporate affiliates required to be reported: None.

Other business names used within the prior two years: None.

IX. Plan Administration and Updates

The VP of Product, or another officer or employee designated by Voxie, is responsible for coordinating administration of this Plan. Voxie will periodically review its customer onboarding, number provisioning, voice-routing practices, complaint and escalation processes, carrier relationships, and applicable FCC requirements. Material changes will be documented and reflected in this Plan and the RMD filing, as required.

Certification

The undersigned, on behalf of Voxie, Inc., certifies that the information contained in this Robocall Mitigation Plan is true, accurate, and complete to the best of the undersigned's knowledge and belief, and that Voxie will implement and maintain the robocall-mitigation practices described herein to the extent applicable to its services and role in the call chain.

Signature: Adam Waid

Name: Adam Waid

Title: Chief Executive Officer

Date: 2026-10-06

CERTIFICATE *of* SIGNATURE

REF. NUMBER

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DOCUMENT COMPLETED BY ALL PARTIES ON

06 OCT 2026 21:12:20
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TIMESTAMP

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SIGNED

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SIGNATURE



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