

Robocall Mitigation Plan — Fonio, Inc.

FCC Robocall Mitigation Database · October 2026

Company. Fonio, Inc. (d/b/a fonio), Delaware corporation, EIN 37-2224988, FRN 0038899936, Dürergasse 7/9, 1060 Vienna, Austria. No parent company, subsidiaries or affiliates at the date of filing; related company fonio GmbH, Vienna, Austria, operates the software platform, and the issuance of all shares of Fonio, Inc. to fonio GmbH is in process (this filing will be updated once completed). Contact for robocall mitigation and traceback: Marc Schuhbauer, Regulatory Counsel, marc@fonio.ai, +43 677 61487751. Principal: Daniel Keinrath, President and CEO.

Role. Voice service provider originating calls for its own business customers (AI phone assistant and cloud PBX). Not a gateway or intermediate provider. fonio is a Delaware corporation whose principal office is in Vienna, Austria. fonio has no own network; all U.S. numbers and traffic are obtained from Bandwidth Inc. and Twilio Inc., both listed in the Robocall Mitigation Database. fonio accepts no traffic from other providers.

STIR/SHAKEN. No implementation under fonio's own certificate yet; calls are signed by the upstream carrier under its certificate. fonio is incapable of obtaining an SPC token under the STI Governance Authority's token access policy until it holds a 499 Filer ID, an OCN and this RMD listing (47 CFR § 64.6304(b)). It has obtained its FRN and is submitting this filing; it will next register with USAC and request an OCN from NECA, then register with the STI-PA, obtain its certificate from an approved STI-CA, sign through Bandwidth's Hosted Signing Service, and update this filing within 10 business days after it begins signing its own calls.

Measures to avoid originating illegal robocalls.

1. Customers are businesses; accounts are opened with company name, address, contact person and billing details, and payments run through Stripe.
2. Outbound calling is disabled until the account holder has completed identity verification through Stripe Identity (government-issued ID).
3. Every account has a default limit of 100 outbound calls per day. Higher limits are granted only on request after review by fonio staff. Technical rate limits apply in addition.
4. Every call is attributable to a customer account. Accounts that generate complaints or traceback requests are suspended pending review; accounts found to originate illegal robocalls are terminated.
5. The Terms of Service require compliance with applicable law, including the TCPA, and allow suspension or termination for violations.

Traceback and cooperation. fonio will respond fully within 24 hours to all traceback requests from the Industry Traceback Group, the FCC and law enforcement, and will cooperate with the FCC, state attorneys general and law enforcement.

Prior enforcement actions. None.

Certification. Fonio, Inc. certifies that the information above is true and correct, that it has implemented the measures described, that it will update this filing within 10 business days of any change and recertify annually.