

EmberDial LLC — Robocall Mitigation Plan

Filed with the Federal Communications Commission's Robocall Mitigation Database under 47 CFR 64.6305(d).

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1. Who we are

EmberDial LLC sells cloud call-center software to businesses, mostly insurance agencies ("customers"). Customers' agents work in a web browser. Our software places customers' outbound calls, connects answered calls to an available agent, and rings agents for inbound calls to customers' numbers.

We sell only to businesses. We do not sell service to consumers, do not sell wholesale or carrier services, and do not accept calls from other voice service providers, domestic or foreign, for onward transmission. Every call on our service is placed or received by one of our own customers' accounts in our software.

2. How calls reach the phone network

- **Carriers.** Our underlying carriers are Telnyx and SignalWire. All telephone numbers on our service are obtained from these carriers, and each is assigned by us to one customer. Customers cannot bring, port in or enter their own numbers.
- **Outbound calls.** Our software asks the carrier's API to place a call. The carrier creates the call on its own network, presents the caller ID we pass (one of our numbers), and signs the call. The agent's audio joins through the carrier's WebRTC service in the agent's browser.
- **Inbound calls.** Calls to a customer's number are delivered by the carrier to our software, which rings that customer's agents in the browser.
- We operate no switch, session border controller or SIP trunk that sends calls to the public switched telephone network, and we accept no SIP traffic from customers or other providers.

3. STIR/SHAKEN status

EmberDial certifies that it has **not implemented** the STIR/SHAKEN authentication framework on any portion of its network (47 CFR 64.6305(d)(1)(iii)). It is a voice service provider **without** a STIR/SHAKEN implementation obligation (64.6305(d)(4)(vi)(C)), for the following reason.

EmberDial LLC is a non-facilities-based voice service provider. It does not own, lease or operate any switch, session border controller or other facility that originates calls onto the public switched telephone network. Its customers' calls are placed through EmberDial's cloud software and are originated onto the PSTN by its underlying carriers, SignalWire and Telnyx, on those carriers' own

networks, using telephone numbers obtained from those carriers. EmberDial has no ability to sign calls or insert STIR/SHAKEN Identity headers: the carrier creates the SIP call and signs it with its own certificate, making its own attestation decision under ATIS-1000074 and ATIS-1000088 for traffic from its customer EmberDial. EmberDial therefore lacks control over the network infrastructure necessary to implement STIR/SHAKEN, and is exempt from 47 CFR 64.6301 on that basis (Call Authentication Trust Anchor, First Report and Order, 35 FCC Rcd 3241, 3260 ¶40 (2020); see also Eighth Report and Order, FCC 24-120, n.64 and ¶17 (2024)). All EmberDial calls that reach the PSTN through these carriers are signed by the carrier.

4. Know your customer: new and renewing customers (47 CFR 64.1200(n)(4))

- **Business customers only, opened by our staff.** Self-service signup is currently turned off. Every customer account is created by EmberDial staff after a sales conversation with the business.
- **Verification before production dialing.** A paying customer cannot dial until EmberDial staff have approved its account. It cannot start a dialing campaign until staff have also approved evidence of its legal entity (for example, a Secretary of State record or IRS EIN letter). When a customer uses our self-service verification flow, the owner uploads a government photo ID and proof of the business, and staff approve or reject it; two rejections suspend the account. Staff can approve an account without that flow only by recording a reason, which is kept in the account's compliance log.
- **Trials are limited.** A trial account cannot dial until EmberDial staff turn dialing on for it. A trial lasts a fixed period (three days by default) and is capped at 100 calls per day.
- **Numbers stay ours.** Because we assign every number to one customer, we always know which customer used a number at a given time, and we can take numbers back.
- **Renewing customers.** Renewal does not lift any of these controls. The agreements, number assignment, verification status and dialing limits stay in force for as long as a customer uses the service, and we can suspend a customer at any time (section 9).

5. Reasonable steps to avoid originating illegal robocalls

1. **Contract.** Customers must accept EmberDial's Master Services Agreement and Acceptable Use Policy. They prohibit illegal robocalls, caller ID spoofing, calls to numbers on Do-Not-Call lists without a lawful basis, and prerecorded or artificial-voice calls without the consent the law requires. They require customers to answer our compliance and traceback inquiries (acknowledge within 2 business days; consent record for a number within 5 business days), and allow EmberDial to suspend or terminate service, recall numbers, and cooperate with carriers, the industry traceback consortium, regulators and law enforcement.
2. **Caller ID.** Outbound calls show only telephone numbers obtained from our carriers. Customers cannot enter a caller ID. Our software picks one of the numbers assigned to that customer.

3. **Do-Not-Call.**

- When a called party asks not to be called again, the agent records it and the number is blocked before every later dial, by every EmberDial customer, not only the one that recorded it. A request made to an AI-assisted call is recorded automatically.
 - Before a paying customer can start a campaign, it must connect its own subscription to a registry scrubbing service (DNC.com, which covers the National Do Not Call Registry and state registries under the customer's own account), save its own federal DNC Subscription Account Number, or attest in writing that it scrubs its own lists. EmberDial staff cannot record this for the customer. When a subscription is connected, each number is checked against it before it is dialed. Staff-authorized trial accounts, limited to 100 calls a day, are exempt from this step; their calls are still checked against the platform-wide list above.
4. **Calling hours.** Each call is checked against the called party's local time before dialing. Calls are placed only between 8 a.m. and 9 p.m. in the called party's local time, and stricter state windows (for example Texas, Alabama and Louisiana) narrow that further.
 5. **Frequency limits.** Calls to one phone number from one customer are limited to 3 per 24 hours for leads in Florida, Oklahoma and Maryland, and 1 per 8 hours for Maine, checked again at the moment the call is placed. Campaigns retry a lead at most 5 times by default. Each number places at most 60 calls per day by default.
 6. **Abandoned calls.** For power and predictive dialing we measure each campaign's abandonment rate over a rolling 30 days. Above 2.5% the dialer slows. Above 3% it dials one line at a time. Above 4.5% (with at least 10 abandoned calls) the campaign is paused. When a live person answers and no agent is free, a recorded notice is played.
 7. **Prerecorded and AI voice.** These are off by default. Voicemail drop is disabled in production. AI-assisted calling, where an AI voice speaks to the called party, is available only to customers EmberDial turns it on for, and each lead needs a recorded consent source and date before it is called.
 8. **Volume limits.** Manual dialing is capped at 500 calls per customer per day and 200 per user per day. Power and predictive dialing are limited by per-campaign pacing and concurrency settings and by the per-number daily cap.

6. Analytics

We use data analytics to detect unwanted traffic:

- **Our own per-number monitoring (nightly).** For Telnyx numbers, a number that places at least 30 calls in 24 hours with fewer than 10% answered by a person is flagged and taken out of rotation. For SignalWire numbers, each number is compared with the rest of its customer's numbers on human answer rate, answers under 10 seconds, abandoned calls, attempts per lead and SIP 603 rejections, and changes alert our staff.
- **Third-party analytics.** Telnyx Number Reputation, for spam labels applied to our Telnyx numbers by carrier analytics engines.
- **Our carriers.** We also rely on the network analytics of our underlying carriers, Telnyx and SignalWire.

7. Know your upstream provider

EmberDial does not receive calls from any upstream voice service provider or intermediate provider for onward transmission; all of our traffic comes from our own customers inside our software. If that ever changes, we will accept calls only from providers whose filings appear in the Robocall Mitigation Database (47 CFR 64.6305(g)), and we will update this plan within 10 business days.

8. Traceback commitment and process

EmberDial commits to respond **fully and within 24 hours** to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

- **Contact.** Requests go to compliance@emberdial.com, which reaches both founders and is checked daily.
- **Identify.** From the calling number, called number and time, our staff look up the call and the customer and user that placed it in our traceback tool, which also covers calls whose lead the customer has deleted. A written runbook covers each step.
- **Respond.** We give the requester the customer's identity and the call records we hold, and pass the request to the customer under the Acceptable Use Policy.
- **Stop.** If the traffic appears illegal, we suspend the customer's dialing or the number while we investigate (section 9).
- **Records.** We keep call recordings and transcripts for 2 years, and compliance records (blocked dials, scrubs, attestations, staff actions) for 5 years. Call records (time, calling and called number, customer, user, carrier call ID, outcome) are kept while the lead exists; if a customer deletes a lead, its calls are first copied into a call log that is kept for 5 years.

9. Enforcement

EmberDial staff can suspend a customer immediately. Suspension blocks the customer's sessions on their next request and stops all dialing. Staff can also turn off a trial's dialing, take numbers back, or end the agreement. Staff actions are recorded.

10. Prior actions or investigations

In the prior two years, neither EmberDial LLC 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 findings of actual or suspected wrongdoing involving illegal robocalls, spoofing, or a deficient Robocall Mitigation Database filing or mitigation program.

11. Keeping this plan current

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