

Robocall Mitigation Plan

Alpha21, LLC, doing business as TabPhone

FCC Registration Number (FRN): 0039026240

Robocall mitigation contact: Olivier Lalonde, Manager, rmd@tabphone.io, (850) 400-3907

Address: 1207 Delaware Ave #787, Wilmington, DE 19806

Effective: October 17, 2026

1. Who we are and how calls reach the network

TabPhone (tabphone.io) sells phone numbers, calling and texting to individuals and small organizations, who use them in TabPhone's web, Android and iPhone apps. Customers pay in advance from a prepaid balance.

TabPhone is a non-facilities-based reseller. It has no telephone network, no Operating Company Number and no direct access to numbering resources. Every call our customers make to or from the public telephone network is originated and terminated by our wholesale provider, 9171-5573 Québec Inc., doing business as VoIP.ms. VoIP.ms holds our customers' numbers and authenticates their outbound calls with STIR/SHAKEN before they leave its network.

TabPhone accepts calls only from its own customers' apps. We don't accept or carry traffic from other voice service providers, so we have no upstream providers to vet.

All calls our customers originate are subject to this plan.

STIR/SHAKEN: we have no obligation to implement STIR/SHAKEN because we lack control over the network infrastructure needed to (First Caller ID Authentication Report and Order, 35 FCC Rcd 3241, 3260, para. 40). VoIP.ms, which handles switching and interconnection for our customers' calls, signs them with its own certificate as their originating provider.

Enforcement history: in the past two years, neither Alpha21, LLC nor any entity under common ownership or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation involving robocalls or its certification.

2. Knowing our customers

- **Verified email:** every account is opened by following a sign-in link sent to the customer's email address. Repeated sign-up attempts from one address or network are rate-limited.
- **Prepaid service:** calling and texting are paid from a prepaid balance topped up by payment card through Stripe, and cards that require it are verified with 3-D Secure. We don't bill for service after it's used.
- **Limits on new accounts:** for its first 7 days, an account can top up at most \$100 a day, which limits how much calling a new or fraudulent account can fund.
- **Numbers per account:** an account can hold at most 30 numbers, so no customer can build the large pools of numbers robocalling relies on.

3. Preventing illegal robocalls

- **Acceptable-use policy:** our terms of service, which every customer accepts, forbid breaking laws on telemarketing, robocalls and spam; unsolicited bulk calls or texts, or contacting people who asked to stop; harassing, defrauding or impersonating anyone; falsifying caller ID; and running an automated calling or texting service. We may suspend or close accounts that break these rules.
- **No caller ID spoofing:** a customer can only place calls from numbers their own account holds through TabPhone. The apps and our servers don't allow any other caller ID.
- **Volume limits:** an account can place at most 60 calls an hour and send at most 200 texts a day. Our apps are built for a person dialing calls one at a time; we offer no autodialer, bulk calling, or programmable calling.
- **Destination limits:** calls to destinations costing more than \$1.00 a minute (premium and satellite numbers, common targets of fraud) are refused.

4. Detecting and stopping abuse

- **Call analytics:** we don't use a third-party call analytics system or vendor. Our own servers count each account's calls and texts as they're placed and refuse those over the limits above, and refuse calls to blocked destinations, before they reach the telephone network.
- We review accounts that reach their call or text limits, and complaints or reports received at rmd@tabphone.io or support@tabphone.io.
- When we find or are told of illegal robocalls, spoofing, or other violations of our acceptable-use policy, we suspend the account's calling and texting at once, investigate, and close the account and release its numbers if the violation is confirmed. We don't refund balances to accounts closed for illegal robocalling.
- We report illegal robocalling we find to the Industry Traceback Group and, where appropriate, to law enforcement.

5. Traceback and cooperation

- We commit to respond fully, within 24 hours, to traceback requests from the Commission, law enforcement, and the Industry Traceback Group, and to cooperate with them in investigating and stopping any illegal robocaller that uses our service.
- Traceback requests go to rmd@tabphone.io, which is monitored every day.
- Each customer's calls go through their own sub-account at VoIP.ms, which keeps call detail records (number used, destination, time and duration) for each one. From a call's number and time, we can identify the customer who placed it.

6. Review

We review this plan at least once a year, when we recertify in the Robocall Mitigation Database, and whenever our service or the Commission's rules change.