

CallPad Inc. — Robocall Mitigation Plan (47 CFR § 64.6305)

Entity: CallPad Inc. (DE File No. 10058137 · NJ Entity ID 0451548954 · EIN 33-2769724 · FCC FRN 0039042882)

Principal Office: 1635 Center St, Point Pleasant, NJ 08742 · **Traceback & RMD Contact:** Kevin Sean Scalabrini, CTO · sean@callpad.ai · +1 973-741-6865 · **Effective Date:** October 23, 2026

1. Company, Affiliates, and Network Role

CallPad Inc. (Delaware corporation; NJ Entity ID 0451548954; FCC FRN 0039042882) is a US interconnected VoIP (iVoIP) service provider selling hosted business phone service, AI receptionist voice capabilities, and pre-provisioned Yealink IP handsets to small, single-location US businesses (primarily hair and beauty salons) from its principal office at 1635 Center St, Point Pleasant, NJ 08742. CallPad Inc. is owned 50% by Kevin Sean Scalabrini (CTO & Director) and 50% by Conrad James (CEO & Director, resident of Canada), and has no parent company. Its commonly owned foreign affiliates are Callpad GmbH (Stubbenkammerstraße 12, 10437 Berlin, Germany) and CallPad Limited (UK Company No. 16875253, 125 Clive Road, Canton, Cardiff, CF5 1GL, UK); neither foreign affiliate provides US voice service. CallPad Inc. is a non-gateway voice service provider, accepts no foreign-originated or wholesale traffic, and relies exclusively on Twilio Inc. (FRN 0025092958, RMD0006057) as its underlying downstream carrier for call origination, termination, E911 routing, and telephone numbering.

2. Complete STIR/SHAKEN Implementation

CallPad Inc. certifies complete STIR/SHAKEN implementation on its IP network through Twilio Inc. acting as signing agent. Outbound calls are authenticated via Twilio's Trust Hub (Twilio Approved Primary Business Profile BUb2c91597b7a18af3788dd678e085c3b0 and Twilio Approved SHAKEN/STIR Trusted Calling Trust Product BU985b5fba8c49a7669ef5a2f70e3430f5, 'CallPad Inc.'). Because CallPad assigns every telephone number directly to a KYC-verified business customer (or verifies ownership of ported-in numbers), Twilio signs verified customer calls with A-level (Full) attestation. Calls without verified caller ID assignment are blocked or signed at a lower attestation level. CallPad does not currently hold a separate OCN or SPC token and will update this plan within 10 business days if it obtains them.

3. Know-Your-Customer (KYC) & Onboarding Verification

Before activating any new or renewing account, CallPad verifies: (a) legal business name, federal EIN or state business registration, and active retail business presence; (b) physical business street address and suite/unit matched to the E911 Dispatchable Location; (c) identity and contact details of the authorized representative; and (d) a payment method (US business card or ACH) in the business's own name. Customers porting in numbers must provide a signed Letter of Authorization (LOA) and a recent carrier bill (<30 days) proving ownership. Applicants showing risk signals (anonymous/prepaid payment, address mismatch, residential use posing as a business, bulk/automated calling requests, or prior robocall enforcement) are declined.

4. Permitted Traffic, Usage Controls, and Anomaly Monitoring

CallPad's service is limited to ordinary person-to-person SMB calling (such as salon appointment bookings). CallPad's Terms and Acceptable Use Policy prohibit autodialers, predictive dialers, telemarketing, cold calling, voice broadcasting, and caller ID spoofing. Accounts carry single-location concurrency and daily outbound call caps. CallPad monitors in real time for volume spikes, high rates of short-duration (<=6s) or unanswered calls, sequential/random dialing patterns, and unauthorized caller ID, and automatically suspends anomalous accounts pending compliance review.

5. Caller ID Integrity and Mandatory Call Blocking

Outbound calls may display only numbers assigned to or verified for that customer. CallPad, with Twilio, blocks calls bearing invalid, unallocated, unassigned, or Do-Not-Originate (DNO) numbers and complies with all FCC mandatory blocking rules, including blocking after receipt of a Notice of Suspected Illegal Traffic under 47 CFR § 64.1200(k)/(n).

6. 24-Hour Traceback Cooperation

CallPad commits to responding fully and within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG). Designated 24/7 Traceback Contact: Kevin Sean Scalabrini, CTO, sean@callpad.ai, +1 973-741-6865 (alternate: Conrad James, CEO, conrad@callpad.ai).

7. Investigation, Suspension, and Remediation

When CallPad identifies or is notified of suspected illegal robocalls, it immediately suspends the originating customer, investigates within 24 hours, terminates the account if illegal traffic is confirmed, and preserves CDRs and KYC records for enforcement inspection.

8. Upstream and Downstream Providers

CallPad accepts no wholesale traffic from upstream providers and sends traffic exclusively to Twilio Inc. (FRN 0025092958, RMD0006057), which is certified in the FCC Robocall Mitigation Database. CallPad will verify RMD listing before exchanging traffic with any future provider.

9. Updates and Annual Recertification (47 CFR § 64.6305(h))

CallPad will update its Robocall Mitigation Database filing within 10 business days of any change to required information (including assignment of its USAC Form 499 Filer ID) and will recertify annually on or before March 1 of each year.

10. Officer Certification

I certify that I am an officer (Chief Technology Officer) of CallPad Inc., that the statements above are true and correct, and that CallPad Inc. has implemented and will carry out this Robocall Mitigation Plan.

Signature: /s/ Kevin Sean Scalabrini **Date:** October 23, 2026

Printed Name & Title: Kevin Sean Scalabrini, Chief Technology Officer (CTO), CallPad Inc.