Tolos LLC. Robocall Mitigation Program

Filer role: voice service provider without a STIR/SHAKEN obligation (no network infrastructure).

Date: 2026-10-27

1. Our service. Tolos LLC provides software that insurance agents use to call their own leads. Tolos does not own or operate a network. It obtains telephone numbers and call origination from upstream carriers that are listed in the Robocall Mitigation Database. Tolos does not provide service to other carriers, resellers or call centers.

2. New and renewing customers. Every customer is an identified individual agent. Before using the service, and again whenever our Terms change, the customer must accept our Terms. Before first use the customer gives their name, email address and phone number and confirms the email with a one-time code. Our Terms contractually prohibit illegal calls, require the customer to comply with telemarketing and do-not-call laws, and allow Tolos to suspend or end service for a violation.

3. Upstream providers. Tolos obtains numbers and call origination only from established upstream carriers that are listed in the Robocall Mitigation Database and that authenticate calls with STIR/SHAKEN. Before using a carrier, Tolos confirms its listing in the Database. Our agreements with our carriers include acceptable-use terms that prohibit illegal robocalls.

4. Call analytics. Tolos uses the number reputation service of its upstream carrier to check its numbers for spam labels, and stops using a flagged number for calls. Tolos uses no other call analytics vendor. The service also refuses calls that fail the checks listed in section 5 and records the reason for each refusal.

5. Reasonable steps to avoid illegal robocalls.

- The service does not play prerecorded or artificial-voice messages to called parties.
- Calls are placed only from numbers obtained from our carriers and assigned to the calling customer.
- Before a call is placed, the service checks the customer's do-not-call list and the called party's local calling hours.
- A called party who asks not to be called again is added to the customer's do-not-call list, and later calls to that party are refused.
- Usage limits apply to each customer and each number.

6. Response to illegal traffic. When Tolos learns that a customer is originating illegal calls, Tolos can suspend that customer's service immediately without affecting other customers.

7. Traceback. Tolos commits to respond fully and within 24 hours to traceback requests from the Commission, law enforcement and the industry traceback consortium, and to cooperate with them in investigating and stopping any illegal robocallers using its service. Contact: contact@tolosllc.com.

8. Enforcement history. Tolos LLC has not been the subject of any formal or informal Commission, law enforcement or regulatory agency action or investigation relating to illegal robocalls, spoofing or a deficient Robocall Mitigation Database filing in the past two years.