Domu Robocall Mitigation Plan

Last updated: November 15, 2026

1. Company and role in the call chain

Domu runs AI voice agents that place and receive calls on behalf of regulated lenders and loan servicers. Domu takes "reasonable steps" to make sure it never originates or carries illegal robocalls, as described in this plan.

Item	**Value**
Legal name	Domu Technology Inc.
FCC Registration Number (FRN)	**0039222377**
499 Filer ID	Not yet assigned
Address	1000 Brannan St. San Francisco CA, 94103
Role in call chain	Non-facilities-based voice service provider without a STIR/SHAKEN obligation
Underlying carrier(s)	Claro
Customers	Banks, lenders, loan servicers and collection agencies (business customers only, no consumers)
Call types	Outbound and inbound account servicing calls (payment reminders, collections, loan servicing)

2. STIR/SHAKEN status

Domu does not run its own phone network. Calls are passed to Claro, which signs them under STIR/SHAKEN.

- Certification in the RMD: No STIR/SHAKEN implementation (robocall mitigation only)
- Caller IDs used: only numbers assigned to Domu by Claro, or numbers verified as belonging to the Domu customer the call is made for
- Attestation: Domu gives Claro the information it needs to sign Domu's calls at the highest attestation level (proof Domu knows the customer and the customer has the right to use the number)

Exemption: Domu is exempt from implementing STIR/SHAKEN because it lacks control over the network infrastructure necessary to implement STIR/SHAKEN, as recognized in the Second Caller ID Authentication Report

and Order, 36 FCC Rcd 1859 (2020), and 47 CFR § 64.6305(d)(2)(i). Domu is a non-facilities-based provider of AI voice software for regulated financial services companies. It does not own or operate a voice network, switches, or numbering resources. Domu's underlying carrier, Claro, assigns the telephone numbers Domu uses, originates Domu's calls onto the public phone network, and authenticates (signs) those calls under STIR/SHAKEN.

3. Customer vetting (know your customer)

Domu only works with vetted, regulated businesses under signed contracts. No self-signup, no anonymous accounts. Before any calls go live, Domu:

1. Confirms the customer's legal name, address, tax ID and business registration
2. Confirms the customer is a regulated financial services company and, where required, holds the right licenses (e.g. state collection licenses)
3. Checks the customer against public enforcement and sanctions lists (FCC, FTC, OFAC)
4. Gets proof the customer owns or has the right to use every caller ID number (carrier invoice or letter of authorization)
5. Signs a contract (MSA) where the customer commits to follow the TCPA, FDCPA, Regulation F, Do Not Call rules and state laws
6. Confirms the customer has consent or a lawful basis to call each consumer

Domu repeats checks 2 to 4 at least once a year and whenever a customer adds new numbers.

4. Call practices that prevent illegal robocalls

Domu's platform enforces these rules by default. Customers cannot turn them off.

- **Real caller ID only:** no spoofing. Every outbound call shows a verified number from section 3
- **Calling hours:** only 8am to 9pm in the consumer's local time
- **Call frequency caps:** follows Regulation F limits (no more than 7 call attempts in 7 days per debt)
- **Do Not Call:** honors opt-outs right away and checks internal and national Do Not Call lists
- **AI disclosure:** the agent says it is an automated assistant and gives the company name at the start of the call
- **Opt-out on every call:** the consumer can ask to stop calls at any point
- **Do Not Originate list:** blocks calls using numbers on the industry Do Not Originate list, invalid or unassigned numbers
- **No unsolicited marketing:** Domu traffic is account servicing for existing customer relationships only

5. Monitoring and detection

Domu reviews call data every day to catch suspicious traffic early. Alerts go to domu@domu.ai.
Red flags Domu watches for:

- Sudden jumps in call volume from one customer or number
- Unusually short calls or low answer rates (signs of mass dialing)
- High complaint, opt-out or block rates
- Calls using numbers that are not on the customer's approved list
- Calls outside allowed hours or above frequency caps

When a red flag shows up, Domu pauses the affected traffic, reviews it within the times established by the SLAs, and resumes only once the cause is fixed.

6. Traceback and cooperation

Domu commits to respond fully to every traceback request within 24 hours.

- Applies to requests from the FCC, law enforcement, state Attorneys General and the Industry Traceback Group (ITG)
- Domu identifies the customer behind the call and shares the call records needed to trace it

- Domu cooperates fully with any investigation of suspected illegal calls
- Domu keeps call records for at least 2 years so it can answer tracebacks

7. Blocking and enforcement

If Domu is notified of illegal traffic, it stops it right away. Details are in the separate Fraudulent and Illegal Voice Traffic Policy.

- **On notice from the FCC, FTC, a state AG or the ITG:** Domu investigates promptly and blocks the identified traffic and similar traffic from the same customer
- **Customer consequences:** suspension of calling, and contract termination for serious or repeat cases
- **Upstream providers:** Domu only accepts and sends traffic through providers listed in the Robocall Mitigation Database
- **Records:** every incident and action taken is logged

8. Contact, ownership and review

Item	Value
Robocall mitigation contact (name, title)	Munim Afridi, Adriana Munoz
Email / phone	munim@domu.ai , adriana@domu.ai
Plan owner	Munim Afridi
Review cycle	At least yearly, before the RMD recertification due March 1, and whenever FCC rules change

Domu will update its RMD filing within 10 business days of any change to this information.