

TCPA CONSENT & OUTREACH SCRIPTING

VERSION 3.0 · AUGUST 2026 · STOPLOSSES.AI LLC · SCHOOLS.ASKELIRA.COM/LEGAL

Guardian consent form and communications scripts for enrollment and attendance outreach.

SCOPE OF THIS DOCUMENT

Applies To	Guardians, parents, and emergency contacts of students enrolled in, waitlisted at, or offered admission to a partner school using schools.askelira.com
Operated By	stoplosses.ai LLC ("AskElira") on behalf of {{school_name}} ("the School")
Governing Frameworks	TCPA, 47 U.S.C. § 227; 47 CFR § 64.1200; CTIA Messaging Principles; CAN-SPAM Act, 15 U.S.C. § 7701 <i>et seq.</i>
Related Agreements	Operates alongside the DPA, NY § 2-d Addendum, and Privacy Policy

Read before use

Part A is the Guardian Consent Form families sign before receiving automated outreach. Part B is the call, text, and email scripts. Bracketed fields are completed per school. **TCPA statutory damages run \$500–\$1,500 per call or text**; the consent record described in Section 20 is the primary defense.

PART A — CONSENT FRAMEWORK

1. Purpose & Legal Framework

The TCPA, 47 U.S.C. § 227, and 47 CFR § 64.1200 govern automated and prerecorded/artificial-voice calls and text messages. Consent must exist **before** AskElira, acting for the School, initiates any automated Communication — consent obtained through the automated message itself does not satisfy this requirement. AskElira captures consent upstream, before a guardian's contact information enters its outreach system, through one of the two pathways in Section 3. These Communications are informational/operational (enrollment status, waitlist updates, admission offers, and day-to-day operations such as attendance) at a nonprofit charter school, not telemarketing; AskElira applies the more conservative written-consent standard regardless.

2. Scope of Consent

Consent covers guardians, parents, and emergency contacts, for non-emergency communications regarding enrollment status, waitlist updates, admission offers, daily attendance, and other school-operations information throughout the school year, delivered by: calls placed using an automatic telephone dialing system; calls using a prerecorded or artificial voice (**delivered as a deterministic keypad-response IVR and text-to-speech announcements** — see Section 5); automated text messages (SMS/MMS); and email. Consent covers the duration of the guardian's relationship with the School and does not extend to any channel not listed.

3. How Consent Is Captured — Two Pathways

Pathway A — School Enrollment Application (Primary). Consent is captured through the School's own application using AskElira's standardized language (the companion "Guardian Consent Language for Enrollment Applications"), covering enrollment and later school-year communications. The School's enrollment system (e.g., SchoolMint) transmits the resulting consent status to AskElira with the guardian's contact information.

Pathway B — Standalone Guardian Consent Form (Fallback). Where a School has not added the language to its application, guardians complete the standalone form in Sections 5–13. AskElira's system will not place an automated call or send an automated text or email to a guardian until a consent status of "confirmed" exists through Pathway A or B. A guardian's reply to an outbound message is never treated as the original source of consent — only as a subsequent action (such as revocation).

4. Source of Communications

Communications may come from the School, its family-communications technology provider stoplosses.ai LLC, or communications-infrastructure providers acting on the School's behalf — specifically **Twilio Inc. (text-message delivery and voice-call delivery)**. The former third-party conversational-voice provider has been retired; voice runs on Twilio.

5. Call Recording & Transcription — None.

Automated voice calls placed by or on behalf of the School are delivered as a deterministic keypad-response IVR (for enrollment) and plain text-to-speech announcements (for attendance). These calls are NOT recorded and NOT transcribed. AskElira retains only the **Call Outcome Record** — the disposition (for example: accepted via keypad, declined, no answer, wrong number) and a brief operational summary. Because no audio is recorded, no state wiretap/recording disclosure is required, and multi-state (all-party-consent) recording law does not apply. If the School and AskElira ever separately agree in writing to enable audio recording, the Voice Call Script in Part B must first be updated to add the required recording disclosure before any substantive content, and counsel must confirm the approach for recipients in all-party-consent states (for example California, Florida, and Pennsylvania) before recording is enabled. Call Outcome Records are treated as Student Data and follow the DPA § 9 retention matrix.

6. Whose Consent This Form Covers

This consent applies to the parent, guardian, or emergency contact who signs, provided that person is the subscriber or customary/regular user of the phone number(s) and email address(es) listed. **If I provide a number or email belonging to another guardian or contact, I will ask that person to complete a separate consent form, and no automated communication will be sent to that number or address until they have done so.** A consent given by one person cannot supply another person's consent, because 47 U.S.C. § 227(b)(1) requires the consent of the called party.

7. Not a Condition of Enrollment

Giving consent is entirely voluntary and is not required as a condition of my child's enrollment, admission, or receipt of any service. Declining or later revoking consent will not affect my child's enrollment status, waitlist position, or eligibility.

8. Revocation of Consent

I may revoke consent at any time through **any reasonable method**, including replying STOP — or writing anything that plainly asks the School to stop, such as "please stop texting me" — to a text message or, where the School has enabled that channel, in the WhatsApp conversation; clicking "unsubscribe" in an email; pressing **8** during *any* automated call, enrollment or attendance; or contacting the School office directly. (**Press 6** during an attendance call is not a revocation — it stops attendance telephone calls only, leaves the text and email notices running, and is reversible by texting CALLS. **Press 9 on any automated call connects the caller to the School's main office and never changes contact status.**) AskElira honors a revocation received by any of these methods and will cease the affected automated Communications **within 2 business days**, which is well inside the ten-business-day maximum in 47 CFR § 64.1200(a)(10).

Scope of a revocation — all channels, all message types, permanently. A revocation given by any of these methods is recorded as a permanent, all-channel do-not-contact suppression for that telephone number and email address. **One keypad option is deliberately narrower and is not a revocation:** press 6 during an attendance call stops attendance *telephone calls* only, leaving the text and email notices running, because many families want the notice without the call. It is reversible — texting the word **CALLS** from that number turns the calls back on — and it is the only reversible suppression AskElira operates. A revocation is never reversed by a keyword: a number that has texted STOP stays suppressed on every channel, and re-subscribing is handled by the carrier-level START and UNSTOP keywords, not by anything AskElira invented. AskElira does not confirm any request to the recipient unless the record has actually been written. It is not limited to the channel it arrived on or to the type of message that prompted it: a STOP sent in reply to an attendance text also ends enrollment calls, texts, and emails, and a wrong-number report ends everything to that number. The FCC requirement that a revocation given in response to one type of informational message apply to all future robocalls and robotexts on unrelated matters does not take effect until **January 31, 2027** — the Consumer and Governmental Affairs Bureau extended the waiver of that portion of § 64.1200(a)(10) that far (Order DA 26-12, released January 6, 2026) — but **AskElira applies it now**, as the platform's suppression list has always been all-channel. The remainder of the 2024 revocation rules is in effect and is followed.

9. Reassigned Numbers & Wrong-Number Safeguard

To reduce the risk of reaching someone other than the person who consented, AskElira:

- offers a keypad wrong-number key (**press 7**) in every automated call, enrollment and attendance alike, which permanently suppresses all automated Communications to that number;
- invites a wrong-number report in every text message ("reply WRONG NUMBER if this number no longer belongs to you") and accepts any sentence to that effect, in English or Spanish;
- immediately and permanently suppresses further automated Communications to any number or address reported as a wrong number, treating the report as a revocation under Section 8;
- prompts the School to confirm guardian contact information at the start of each enrollment cycle and whenever a number produces repeated no-answer dispositions; and
- caps automated enrollment calls at three attempts per enrollment event, across three separate time windows, and at no more than three attempts to any one family in any seven-day period, after which the family is flagged to school staff rather than dialed again.

Reassigned Numbers Database. AskElira does not query the FCC Reassigned Numbers Database and **does not claim the safe harbor** in 47 CFR § 64.1200(m), which is available only where the current database was properly checked. It relies instead on the wrong-number controls described above. Use of the database is

optional and no statutory call-volume threshold exists, so the trigger for adopting it is written in terms of risk rather than volume. AskElira will adopt database queries — and will then meet the § 64.1200(m) conditions so that the safe harbor is available — before it begins operating in any of the following circumstances:

- the consent on file is more than **twelve months** old and the number has not been confirmed by the family since;
- the number has produced repeated no-answer or undeliverable results across a full outreach cycle; or
- a school is onboarded with a roster imported from a source other than its own current enrollment system.

Below those conditions the operative safeguards are the in-call wrong-number key, wrong-number reporting by text, permanent suppression on report, and the three-attempt cap.

10. Duration of Consent

This consent remains in effect until revoked under Section 8, or until my child is no longer enrolled in, waitlisted at, or seeking admission to the School, whichever occurs first.

11–13. Fallback Guardian Consent Form (Pathway B Only)

(Completed only where the School has not added the Section 3 Pathway A language to its own application.)

☐ **Yes** — I am the parent, guardian, or emergency contact for the phone number(s) and email address(es) listed below, I am the subscriber or regular/customary user of each, and I consent to receive the Communications in Section 2, including by autodialed calls, prerecorded or artificial-voice calls, and automated text messages. ☐ **No** — I do not consent; the School may still reach me through non-automated means.

What this consent covers. Enrollment offers and admission decisions · waitlist status · **daily attendance notices** · general announcements and reminders about the school year. These are the subjects of the Communications described in Section 2, and consent covers all of them.

How you want to be reached — tick each one you agree to. These are separate permissions: ticking one does not tick another, and you may leave any of them blank.

☐ **Text messages.** I agree to receive enrollment- and attendance-related **text messages** (including automated or AI-assisted) at the mobile number above. Message frequency varies. Message and data rates may apply. Reply STOP to cancel, HELP for help.

☐ **Phone calls.** Separate from the text-message permission above: I agree to receive enrollment- and attendance-related **phone calls** (including automated and prerecorded or AI-assisted voice) at the number above.

☐ **Email.** I agree to receive enrollment- and attendance-related **email** at the address above.

☐ **No thank you** — do not text or call this number. The School may still reach me by non-automated means.

Why these are separate: carrier registration rules for automated text messaging (A2P 10DLC) require consent for text messages to stand on its own and not be collected together with consent for any other channel. A single box covering calls and texts will not pass carrier vetting.

*Each permission is recorded and enforced separately before every send: ticking text messages but not phone calls means no automated telephone call is ever placed to this number. A guardian who wants attendance telephone calls stopped but the texts and emails kept can press **6** during any attendance call, or ask the school*

office, at any time afterwards. AskElira sends no guardian-facing communication about a student's IEP; where a student has an IEP flag, the notification goes to the School's own IEP director, not to the family.

Signature: _____ Date: _____ Printed Name: _____
Relationship to Student: _____ · Phone(s): _____
· Email: _____

The School is an equal-opportunity provider and does not discriminate on the basis of race, color, national origin, sex, disability, or age. This form is available in translation upon request.

PART B — APPROVED OUTREACH SCRIPTS

Each includes the disclosures required by the TCPA, FCC rules, CTIA Messaging Principles, and (for email) CAN-SPAM. Elements marked [REQUIRED] may not be removed without counsel's sign-off.

14. Voice Call Script (Keypad IVR — Enrollment)

Used only for guardians whose consent status is "confirmed." Delivered as a deterministic keypad IVR over Twilio — no recording, no transcription.

Greeting, spoken on every answered call before the language menu:

"Hello, this is Elira, the automated enrollment assistant for **[School Legal Name]**. This call is placed on the School's behalf by **stoplosses.ai LLC**. **[REQUIRED: sender identification — 47 CFR § 64.1200(b)(1).** **Both names are spoken because both are responsible for initiating the call. Insert the School's name exactly as it is registered to conduct business.]** I'm calling about a seat that has been offered to **[Student First Name]**. To keep the seat, the school needs an answer by **[deadline]**. You can reach the school office at **[office phone number]**. **[REQUIRED: callback number — 47 CFR § 64.1200(b)(2)]** To continue: press 1 for English. Press 2 for Spanish. Press 3 for Arabic. To speak with the main office, press 9 at any time. If we have reached the wrong number, press 7."

The opening is split into two spoken parts so audio begins immediately, and the whole opening plays **twice** before the short menu — a call answered by a screening service or a voicemail greeting loses the first pass, and the second carries the same facts. The offer details sit in the opening rather than only in the closing line so that a recording captures them in the first seconds rather than a minute in, after a mailbox may already have cut off.

Press 7 is offered at the language menu as well as the seat menu, so a recipient who knows immediately that the number is wrong is not made to sit through a seat offer naming a child who is not theirs.

Seat menu, after the language selection:

"**[Student First Name]** has been offered a seat at **[School Name]**. The registration deadline is **[date]**. To **accept** the seat press **1**. To **decline** press **2**. To speak with the main office press **9**. If we have reached the wrong number, press **7**. To stop all automated calls, texts, and emails from the school to this number, permanently, press **8**. **[REQUIRED: opt-out]"**

Spoken after a 7 or an 8, once the suppression has been recorded:

"Thank you. We have marked this as a wrong number and will not call or text it again." (press 7) — or —
"Understood. We have stopped all automated calls and messages to this number." (press 8) "If that was a mistake, please call the main office at **[office phone number]**. Goodbye."

The callback number is spoken on **every** answered call, before the caller chooses a language, so it is stated whether the call reaches a person, a screening service, or voicemail. **AskElira does not place enrollment calls for a School that has not supplied a main office number** — the dialer refuses rather than place a call that cannot carry the required callback number. The enrollment call speaks the student's **first name only**. **Decisions are keypad-only** — the script never invites a spoken answer, because spoken responses proved unreliable across languages. Pressing 7 or 8 records the same permanent, all-channel suppression a STOP text records, and never records a seat decision.

14a. Attendance Call Script (Text-to-Speech)

"Hello, this is Elira, the automated attendance assistant for **[School Legal Name]**. This call is placed on the School's behalf by **stoplosses.ai LLC**. **[REQUIRED: sender identification — 47 CFR § 64.1200(b)(1)]** Our records show **[Student First Name]** was marked absent today, **[date]**. If this is a mistake, please call the office at **[phone number]**. **[REQUIRED: callback number — 47 CFR § 64.1200(b)(2)]** To hear this message again, press **1**. To speak with the main office, press **9**. To stop these attendance calls only — you will still get the text and email notices — press **6**. If we have reached the wrong number, press **7**. To stop all automated calls, texts, and emails from the school to this number, permanently, press **8**. **[REQUIRED: opt-out]** This call is **not recorded**."

Spoken after a 6, once the request has been recorded:

"Understood. You will no longer receive these calls. You will still get the text and email notices. To turn the calls back on any time, text the word **CALLS** to this number. Goodbye."

The spoken announcement uses the student's first name only. A voice call plays to whoever picks up and to any answering machine in the room, so it is not a verified channel, and a full name paired with "was marked absent" is more than that setting warrants. The **text and email** notices — addressed to a specific consented endpoint — carry the student's full name, which a household with more than one child needs. AskElira permanently suppresses any number reported as a wrong number and honors the press-6 attendance-call opt-out for that number. **Attendance calls carry the same 7, 8 and 9 keys as enrollment calls, with identical meanings**, so a family that learns a digit on one call can rely on it on every other. The attendance-only channel preference was given its own digit, **6**, precisely so that no digit means "stop everything" on one call and "stop only these calls" on another. One digit, one meaning.

15. SMS / Text Message Script

The first text discloses why the guardian is receiving it rather than asking them to opt in — consent was already established through Part A.

"**[School Name]**: Hi, this is Elira, **[School Name]**'s enrollment assistant. You're receiving this because you agreed to enrollment updates on your application for **[Student First Name]**. **[Message content]**.

[REQUIRED] Reply **STOP** to opt out, **HELP** for help, or **WRONG NUMBER** if this number no longer belongs to you. Msg frequency varies. Msg & data rates may apply. Terms & privacy: schools.askelira.com/legal"

The platform also honors plain-language revocations ("please stop texting me", "déjenme en paz") and plain-language wrong-number reports, not only the keywords. **HELP** is answered by the carrier-level automatic reply configured on the messaging service.

16. Email Script

Subject: **[School Name] — Enrollment Update for [Student First Name]**

"Dear **[Guardian Name]**, **[REQUIRED: sender identification]** this email is from **[School Name]**, sent through its technology partner stoplosses.ai LLC, regarding **[purpose]**. **[Message content]**. If you no longer wish to receive these emails, **[REQUIRED]** click unsubscribe below or contact **[school office email/phone]**." Footer: **[REQUIRED] [School Name]** as sender, the School's own valid physical postal address, and the unsubscribe link. **The School is the sender for purposes of 15 U.S.C. § 7704(a)(5)(A)(iii), so the postal address printed in the footer is the School's, not AskElira's.**

16a. Voicemail Message

Spoken at the end of every enrollment call, so it is what a mailbox records:

"Hello, this is Elira, the automated enrollment assistant calling on behalf of **[School Name]**. We are calling about a seat that has been offered to **[Student First Name]**. To keep the seat, the school needs your answer by **[deadline]**. Please call the school office at **[office phone number]** to accept or decline, or wait for our next call. Thank you!"

And at the end of every attendance call:

"This message is from **[School Name]** about your child's attendance today. If you have questions, please call the school office at **[office phone number]**. Goodbye."

Neither voicemail message offers keypad options, which cannot be used on a recording. Answering-machine detection is **not** used on either call type: it proved unreliable in both directions — reading a call-screening service as a machine and sending a live parent to the voicemail script, and separately calling a greeting over early so that the notice played into it and only the closing line reached the tape. Without it the call is voicemail-safe by construction, because the substance plays twice and the closing line stands alone as a message.

17. Calling & Texting Time Window

Automated enrollment voice calls run only Monday–Friday, in **three escalating attempt windows**, one attempt per window, up to three attempts per enrollment event. The windows below are stated in **Eastern Time (the School's own time zone)**, and a call is placed only if the moment also falls between 8:00 AM and 8:00 PM **in the recipient's own local time**, determined from the telephone number. Where the two disagree, the later opening and the earlier closing govern; where the recipient's zone cannot be determined from the number, the Eastern window governs alone. 47 CFR § 64.1200(c)(1) keys its restriction to the called party's local time, so a guardian with a Pacific-zone number is not called at 5:00 AM their time:

- **Attempt 1** — 9:00 AM–12:00 PM;
- **Attempt 2** — 5:00 PM–6:30 PM (families who did not respond to attempt 1);
- **Attempt 3** — 1:00 PM–4:00 PM.

Where the School enables Daily Attendance Alerts, a separate attendance call is placed on school days beginning at approximately 9:00 AM Eastern and completing within that morning, no more than one per student absence. **No automated voice calls on Saturday or Sunday. The late-arrival (tardy) notice is a separate, School-enabled option and is OFF unless the School switches it on.** Where a School's upload marks a student late rather than absent, and only where the School has switched the tardy notice on, AskElira sends **one bilingual text message and nothing else** — no automated call and no email — no more than once per student per school day, in the same weekday window and under the same suppression and revocation rules as every other Communication in this document. It is never sent on the strength of an absence consent alone: a School may switch it on only where the consent language it captured discloses it, which is why the frequency

statement in the Guardian Consent Language document names it. A tardy notice tells a guardian their child arrived late; it is never described as an absence, because the student was present. Text messages are sent Monday through Friday only, between 8:00 AM and 8:00 PM **in Eastern Time and in the recipient's own local time** — both conditions must hold, and both are enforced by technical controls in the sending pipeline itself. That is stricter than 47 CFR § 64.1200(c)(1), which restricts telephone *solicitations* to 8:00 AM–9:00 PM in the called party's local time seven days a week and does not reach these informational messages at all.

18. Frequency & Volume Controls

AskElira limits automated outreach regarding the same enrollment event to no more than **1 voice call and 2 text messages per family per 24-hour period**, absent a specific request from the family.

19. Compliance Checklist

DOCUMENT DETAILS

Script element	Requirement satisfied	Citation
Consent captured via application (A) or standalone form (B) before any automated message	Prior express consent must precede, not result from, the message	47 U.S.C. § 227(b)(1)
Sender identified in every call, text, and email	Caller-identity disclosure at the beginning of the message (voice); sender identity in the initial message of the messaging program and in the HELP reply (text)	47 CFR § 64.1200(b)(1) (<i>voice</i>); CTIA Messaging Principles; A2P 10DLC campaign registration (<i>text</i>)
School office callback number spoken on every automated call ; the dialer refuses to place a call for a school that has not supplied one	Callback number permitting a do-not-call request	47 CFR § 64.1200(b)(2)
Attendance voice announcements use the student's first name; full names only in text and email	Data minimization in an unverified channel	FERPA; NY Educ. Law § 2-d
Purpose stated	Informational-call content disclosure	47 CFR § 64.1200(a)
First SMS discloses reason rather than requesting opt-in	Avoids requesting consent via the automated message	47 U.S.C. § 227(b)(1)
Wrong-number report accepted in every text, in keyword or plain language; permanent suppression on report	Reassigned-number risk mitigation	FCC Reassigned Numbers guidance
STOP and plain-language revocation in every text; unsubscribe in every email; press 7 or press 8 on any automated call, enrollment or attendance; school office on any channel — each recorded as a permanent, all-channel suppression. Press 6 on an attendance call is a reversible channel preference, not a revocation, and is described as such	Revocation by any reasonable method, honored within 2 business days and applied across all message types	47 CFR § 64.1200(a)(10); CTIA

Script element	Requirement satisfied	Citation
"Msg & data rates may apply" / frequency disclosure	CTIA Messaging Principles	CTIA Principles
Unsubscribe link + physical address in email	CAN-SPAM	15 U.S.C. § 7704
"Not a condition of enrollment" statement	Prior-express-written-consent best practice	FCC 27 FCC Rcd 1830 (2012)
Voice calls restricted to weekday windows; texts to Mon–Fri 8:00 AM–8:00 PM Eastern	Stricter than the solicitation curfew; enforced in the sending pipeline	47 CFR § 64.1200(c) (1)
No call recording or transcription	State wiretap/recording law not implicated	N/A — no recording

20. Recordkeeping & Retention

AskElira retains a timestamped copy of each guardian's consent record (Pathway A or B) for the duration of the School's engagement plus **four (4) years** thereafter. Each record preserves:

- the **exact text and version** of the consent language the guardian was shown, so the record proves what was agreed to rather than what the current form says;
- the guardian's identity as submitted — name, and the relationship to the student where captured;
- every telephone number and email address the consent covers;
- the consent status and the **date, time, and method** of capture (paper signature, digital submission, or transfer from the School's enrollment system), together with the electronic-signature attestation for digital submissions;
- the subscriber attestation — the guardian's confirmation that they are the subscriber or customary user of each number; and
- the date, method, and channel of any revocation, including keypad revocations (press 7 or press 8 on any automated call), automatic wrong-number revocations, and the reversible attendance-call preference (press 6, reversed by texting CALLS).

Four years is used rather than three so the record outlasts the federal catch-all statute of limitations applied to TCPA claims under 28 U.S.C. § 1658. This record is the primary evidentiary defense in a regulatory inquiry or private TCPA claim, and it is the one category of data deliberately retained past the contract term.

21. Messaging Program Registration, Sending Numbers, and Do-Not-Contact Policy

Who is registered as the messaging Brand. The A2P 10DLC Brand for this messaging program is **stoplosses.ai LLC**, registered under EIN 39-3127695. The School is not the registered Brand and is not required to register one. The traffic runs under a **low-volume mixed** campaign use case covering school enrollment, waitlist, admission, and attendance notifications — the latter comprising both the **absence notice** and the **late-arrival (tardy) notice** described in Section 19, so that a School switching the tardy notice on is not sending a message type its campaign registration does not cover. **stoplosses.ai LLC bears the consequences of a carrier filtering action or campaign suspension**, including any resulting delay in delivery, and will notify the School within one business day of learning of one. The School bears no carrier registration obligation and no carrier penalty arising from AskElira's registration.

What number the messages come from. Text messages and automated calls are placed from a telephone number provisioned through Twilio and assigned to the School's account. **A sending number is not shared between schools.** Where the School has supplied its own number and completed carrier verification, that number is used and appears in caller ID; otherwise a dedicated number provisioned for that School is used, and the School's main office number is spoken in the call and printed in the text footer so a guardian always has a School-operated route back. The School is told which number is assigned to it before the first message is sent.

HELP. Every text promises "HELP for help." AskElira configures a HELP auto-responder on the messaging service that names the School, states that the messages concern the School's enrollment and attendance communications, gives the School's main office number, and repeats the STOP instruction. **AskElira does not enable outbound messaging for a School until that responder is configured and tested for that School's sending number.**

Confirmation of an opt-out. Where a revocation arrives by text message, AskElira sends **one** confirmation text within five minutes of receipt. It confirms the request and its scope and contains no marketing content, consistent with 47 CFR § 64.1200(a)(10). No confirmation is sent unless the suppression record has actually been written, and no further message is sent to that number afterwards.

Written do-not-contact policy. AskElira maintains a written do-not-contact policy governing the suppression list — how an entry is created, on what channels it applies, how long it is kept, and who may remove one. While these messages are informational rather than telemarketing, 47 CFR § 64.1200(d) is not triggered; the policy is nonetheless maintained and is **available on demand** to any person who requests it, at the address in Section 22, so that nothing turns on that classification holding.

21a. WhatsApp — Inbound Only, and Outside the Registered SMS Campaign

Inbound only, and guardian-initiated. Where the School enables WhatsApp as a channel for the family question-and-answer assistant, it runs in one direction: a guardian who chooses to message the School's WhatsApp number gets an answer to the question they asked. **AskElira initiates no WhatsApp message.** No enrollment sequence, no attendance alert, no reminder, and no other outbound Communication described in this document is sent over WhatsApp. A reply exists only because the guardian wrote first, and it answers what they wrote.

Not the registered A2P 10DLC campaign — and that is not a gap in it. The messaging program registered under Section 21 covers SMS traffic on the School's Twilio telephone number. WhatsApp traffic is not part of that campaign and is not subject to A2P 10DLC registration, which governs carrier-delivered SMS. It is governed instead by **Meta's WhatsApp Business Messaging Policy and the WhatsApp Business Terms of Service**, under which a business may reply within a conversation the customer began. **Nothing in that difference relaxes any consent obligation in this document.** A guardian's separate permissions for text messages, phone calls, and email are unaffected by a WhatsApp message and are never inferred from one: writing to the assistant on WhatsApp is not consent to be texted, called, or emailed, and AskElira does not record it as consent to anything.

Revocation and suppression reach this channel too. An all-channel suppression — STOP or any comparable request to a text, the unsubscribe link in an email, **press 8** on any automated call, **press 7** reporting a wrong number, or a request to the school office — suppresses the number on every channel, and AskElira sends no WhatsApp reply to a suppressed number. **A STOP sent on WhatsApp itself does the**

same thing: STOP, or any comparable request written in the WhatsApp conversation, records the identical permanent all-channel do-not-contact suppression a texted STOP records, and is reported to the School with every other revocation under MSA § 4.5, and recorded under Section 20.

Why a stop keyword exists on a channel that sends nothing. WhatsApp needs no opt-out of its own. Nothing is ever sent unprompted, so a guardian who stops writing simply never hears from the assistant again, and WhatsApp's own remedy for a user who wants a business to stop — blocking it in the app — works without any cooperation from AskElira or the School. Neither Meta's WhatsApp Business Messaging Policy nor Twilio requires a keyword here; Meta's opt-out obligation attaches to *sending*, and Twilio's automatic STOP handling is an SMS mechanism that does not apply to WhatsApp. The keyword is honored on this channel for the sake of the *other* channels. 47 CFR § 64.1200(a)(10) lets a called party revoke consent “using any reasonable method”, forbids a caller from designating any exclusive means of revocation, and applies that revocation regardless of the medium in which it reached the caller. A guardian who writes “stop calling me” in the one messaging app they actually use has revoked consent for the School's calls, texts and emails, and AskElira honors it there for the same reason it honors it in an email or on the telephone keypad. Reading it and doing nothing would be a violation on the channels that *do* send. Because the channel is inbound-only, a guardian may also end it simply by not writing again.

What would have to change first. AskElira does not operate, and will not without a written amendment signed under **MSA § 14.2**, any outbound or business-initiated WhatsApp messaging, including template, utility, or marketing messages. Were that ever to change, it would require its own consent basis, captured through Section 3 and recorded like every other channel. **AskElira does not rely on the argument that an internet-delivered message falls outside 47 U.S.C. § 227:** whether or not the TCPA reaches such a message, AskElira applies the same prior-express-written-consent standard before initiating an automated message on any channel, as it does throughout this document.

22. Contact

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Part of the AskElira Schools onboarding packet (v2.7, August 2026). The executed MSA, DPA, and NY Ed Law § 2-d Addendum control over any summary of them.