



RE: Sangoma US Inc.'s Robocall Mitigation Plan

Pursuant to the requirements of 47 C.F.R. § 64.6305, Sangoma US Inc. (the “Company”) now submits this certification.

1. Company commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. Company further commits to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls.¹
2. Other than FCC Order DA 24-1235 made on Dec. 10, 2024 (which notified Company and two of its affiliates to cure their deficient Robocall Mitigation Database filings) at no time in the prior two years has Company (or any entity for which Company shares common ownership, management, directors, or control) been subject of a formal FCC, law enforcement, or regulatory agency action or investigation due to (i) transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls; or (ii) a deficient Robocall Mitigation Database certification or mitigation program and description.²
3. Company requires by contract that all users and resellers of its voice services comply with applicable laws prohibiting illegal robocalling. Further, such contracts allow for blocking and/or termination of services for those that breach such provisions.³
4. Company uses an onboarding wizard and verification requirements to confirm a customer's details when turning on its purchased services. Verification requirements include, but are not limited to, verification of information over the phone, obtaining copies of legal identification documents (e.g., a driver's license), and validation of account ownership (e.g., proof of business ownership; billing address validation). Capabilities of certain services are severely limited for new accounts until the customer completes a verification process.⁴
5. Company uses the Zabbix system to continuously monitor calling patterns in and out of its network to identify fraudulent traffic, including robocalling, traffic pumping, and international toll fraud. If Company determines that a customer is using its services for any illegal activities, including robocalling, Company will suspend or block the services to that customer. Such suspension or blocking may then lead to termination of Company's agreement with the customer.⁵

Continued on next page.

¹ See 47 C.F.R. § 64.6305(d)(2)(iii)

² See 47 C.F.R. § 64.6305(d)(2)(iv)

³ See 47 C.F.R. § 64.6305(d)(2)(ii)

⁴ Id.

⁵ Id.



6. Company will only accept network traffic for termination from third party carriers that are in the Robocall Mitigation Database. Company vets its upstream providers and reviews the Robocall Mitigation Database to determine if they are listed there.⁶

Pursuant to 47 C.F.R § 1.16, the undersigned certifies under penalty of perjury that the attestations contained in this document are true and correct.

Sangoma US Inc.

A handwritten signature in blue ink, appearing to read "Bruce H. Illes", written over a horizontal line.

BY: Bruce Illes, General Counsel

Date: 12-17-2024

⁶ Id.