

## **ROBOCALL MITIGATION PLAN**

This Robocall Mitigation Plan describes the specific reasonable steps SMTA has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

### **Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls**

SMTA has a “know-your-customer” policy through which we exercise due diligence in ensuring that our services are not being used to originate illegal traffic.

SMTA follows the [best practices for vetting caller identity](#) described by the NANC Call Authentication Trust Anchor Working Group.

In addition, for new and renewing customers, SMTA:

- Confirms the customer’s identity and, if it is a business, it’s incorporation documents.
- Confirms the customer’s service address.
- Verifies customer information when contracts are renewed or services are added.
- Verifies the customer’s identity and their right to use the telephone number presented on calls.

Although SMTA’s customer’s generally do not generate a high volume of calls, were SMTA to receive a request for high-volume origination services, it would exercise caution and extensively investigate such customers before granting access to the services.

### **“Know-Your-Upstream Provider” Procedures**

SMTA exercises due diligence prior to accepting traffic from an upstream provider as it seeks to ensure that such providers are not using SMTA to carry or process a high volume of illegal traffic. Specifically, SMTA collects information such as the upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

### **Use of Call Analytics Systems**

Sinch uses Neustar, as the Certificate Authority for SMTA’s switching software, to monitor SMTA’s outbound voice traffic in real time to prevent the origination of illegal robocalls. The software provides detailed reporting identifying suspected illegal robocalls and alerts SMTA if we originate any calls where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database, or has a poor reputation. SMTA immediately investigates any identified calls to determine if the caller was attempting to



originate unlawful robocalls. If SMTA determines that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

### **Commitment to Respond to Traceback Requests**

SMTA commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its services to originate, carry, process illegal robocalls.

Sincerely,

*Derrick Mottern*

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