

SEI DATA, INC.

ROBOCALL MITIGATION PLAN

This Robocall Mitigation Plan describes the specific reasonable steps that SEI Data, Inc. has taken to avoid the origination, carrying, or processing of illegal robocall traffic. SEI Data plays two roles in the call chain. It is (1) a facilities-based voice service provider, and (2) a non-facilities based reseller of long distance service. In SEI Data's role as long distance reseller, the Company's wholesale network provider is Sinch.

SEI Data is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Consistent with § 64.6303 (a)(1), SEI Data is ready to upgrade its entire network to allow for the initiation, maintenance, and termination of SIP calls and fully implement the STIR/SHAKEN framework. However, SEI Data's non-IP network is connected to carriers that do not support IP connectivity; therefore, SEI Data cannot upgrade those Non-IP portions of its network to IP connectivity.

To meet the non-IP network criteria for the continuing STIR SHAKEN extension (§ 64.6303 (a)(2)), SEI Data's parent company, Southeastern Indiana Rural Telephone Cooperative Inc., is a member of NTCA. NTCA participates on the ATIS PTSC Non-IP Call Authentication Task Force working group which developed the (ATIS Solutions) non-IP call authentication solutions. NTCA is serving as Southeastern Indiana Rural Telephone Cooperative Inc. and SEI Data's third-party representative on the ATIS PTSC Non-IP Call Authentication Task Force working group.

SEI Data's parent company, Southeastern Indiana Rural Telephone Cooperative Inc, owns and maintains the network which also has IP-portions which originates calls via SIP connections to other carriers. Southeastern Indiana Rural Telephone Cooperative Inc has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Southeastern Indiana Rural Telephone Cooperative has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP portions of its network with the Southeastern Indiana Rural Telephone Cooperative certificate.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Robocalls

SEI Data has a "know-your-customer" policy through which we exercise due diligence in ensuring that our services are not used to originate illegal traffic. SEI Data thoroughly vets new and renewing customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Although SEI Data's customers generally do not generate a high volume of calls, were SEI Data to receive a request for high-volume origination services, we would exercise caution and extensively investigate such customers before granting access to the services. At a minimum, SEI Data would collect information such as the customer's physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

"Know-Your-Upstream Provider" Procedures

The connections that SEI Data has with upstream providers have been in place for many years, and we know these companies very well (e.g., Brightspeed, Frontier). However, SEI Data exercises due diligence before accepting traffic from any new upstream provider as we seek to ensure that such providers are not using SEI Data to carry or process a high volume of illegal traffic. Specifically, SEI Data 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.

In its role as a non-facilities based reseller for long distance service, SEI Data only offers long distance service to the local voice service customers of SEI Data and its parent company, Southeastern Indiana Rural Telephone Cooperative, Inc. Therefore, in its role as a long-distance service provider, SEI Data knows very well the only upstream providers from which it receives traffic.

Use of Call Analytics Systems

SEI Data has contracted with JSI, an engineering firm, for Robocall Origination Detection Service. JSI downloads SEI Data's call detail records on a monthly basis and looks for patterns indicative of originating robocalling. JSI emails SEI Data a monthly report identifying any detected suspicious call activity. SEI Data examines the reports and investigates and identifies the source of the calls as unlawful or legitimate. If it is determined that a SEI Data customer is originating unlawful robocalls on our network, SEI will either warn the customer to stop or terminate their service as allowed per SEI Data's policy.

In its role as a non-facilities based reseller of long distance service, SEI Data relies, in part, on the call analytics systems of its wholesale provider, Sinch.

Commitment to Respond to Traceback Requests

SEI Data 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 any illegal robocallers that use its services to originate, carry, or process illegal robocalls.