



December 24, 2024

Aumtech's Robocall Mitigation Plan Version 2.0

Following the Code of Federal Regulations (47 C.F.R. §§ 64.6303-6305.), Aumtech submits this Robocall Mitigation Plan. Under 47 C.F.R Section 64.6305(f)(1)(i), Aumtech certifies as the degree of STIR/SHAKEN implementation indicated in its Robocall Mitigation Database registration.

With respect to each subpart of 47 C.F.R. Section 64.6305(f)(2), Aumtech states:

(i) Identification of the type of extension or extensions the non-gateway intermediate provider received under § 64.6304,

STIR/SHAKEN authentication framework on our network has been implemented through our underlying third-party providers, and all calls originating on our network are compliant with 47 C.F.R. Section 64.6301(a)(1) and (2). For Aumtech traffic exchanged in SIP format, STIR/SHAKEN is fully enabled. Aumtech uses Inteliquent, Inc. (d/b/a Sinch America) as the voice service provider. Inteliquent is tasked with executing the STIR/SHAKEN protocol for our network.

Section 64.6304(d) does not require STIR/SHAKEN implementation for those portions of a gateway provider's network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

(ii) The specific reasonable steps the non-gateway intermediate provider has taken to avoid carrying or processing illegal robocall traffic as part of its robocall mitigation program

Aumtech has implemented "know your customer" process. Every Aumtech customer is subject to vetting upon signing an agreement to purchase our platform. This includes the verification of the validity of the business entity making the purchase. We have accurate data on these customers, including their verified company name, tax information, location, and contacts. We also have full access to, and control of our customer's platform from Aumtech, which ensures that if any illegal robocalling occurs, we can disable their trunks and/or completely revoke access to the platform. Aumtech contractually obligates all customers to comply with all legal and regulatory requirements including outbound telemarketing legislation. Specifically, the general terms of our customer agreements include the following:

"... .. Customer shall not use nor permit third parties to use the Services in any manner that violates applicable laws or causes Aumtech to violate applicable Laws, including but not limited to as regards the governance, outbound telemarketing, emergency dialing, call recording and privacy... .. If Customer learns of any violation of the above restriction, it will use reasonable efforts to promptly notify Aumtech Legal Department... .."

Aumtech's carrier partner, Inteliquent, Inc, monitors call traffic for suspicious patterns and notifies Aumtech of any potential fraud or illegal calling. Aumtech engineers are then able to investigate and take appropriate actions, whether to block or allow these calls. Aumtech can trace every call that occurs

on our network back to specific customers and/or individual users of our platform. This capability is based on extensive logging of user logins, originating IP address of those logins, and call detail records. In addition, Aumtech operations personnel receive alerts when suspicious traffic patterns are detected on our carrier partner networks.

- (iii) A statement of the non-gateway intermediate provider's commitment to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls**

Aumtech is committed to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls. Aumtech's designated a point of contact, name, title, address, phone number and email address are in the Robocall Mitigation Database portal.

- (iv) State whether, at any time in the prior two years, the filing entity (and/or any entity for which the filing entity shares common ownership, management, directors, or control) has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description; and, if so, provide a description of any such action or investigation, including all law enforcement or regulatory agencies involved, the date that any action or investigation was commenced, the current status of the action or investigation, a summary of the findings of wrongdoing made in connection with the action or investigation, and whether any final determinations have been issued.**

Aumtech have not been prohibited from filing a certification in the Robocall Mitigation Database and does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations or related state law violations

Third Party Providers

Aumtech has partnered with Inteliquent, Inc. (d/b/a Sinch America) to provide voice services to our customers. Inteliquent, Inc assists us in meeting robocall mitigation compliant by maintaining:

- Network Monitoring
- Traffic Management
- Upstream Providers
- Alerting of Robocall Activity
- Call Analytics

In addition to the above robocall mitigation steps, Inteliquent, Inc. has completes STIR/SHAKEN Implementation status and have fulfilled their own obligations with Robocall Mitigation Database Certification and Program filings.

We have included a copy of their Robocall Mitigation Plans with this filing as Exhibit 1.

EXHIBIT 1: ROBOCALL MITIGATION PLAN: INTELLIQUENT

EXHIBIT TO CERTIFICATION OF INTELIGENT, INC. FOR ROBOCALL MITIGATION DATABASE

As part of Inteligent's¹ submission to the Robocall Mitigation Database, pursuant to the FCC's *Sixth Caller ID Authentication Report and Order*, and applicable predecessor orders, this document describes (1) the specific reasonable steps Inteligent takes to avoid carrying or processing illegal robocall traffic; (2) Inteligent's commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium; and (3) Inteligent's commitment to cooperate with such entities in investigating and stopping any illegal robocallers that use the provider's service to carry or process calls.² Inteligent, Inc. previously provided its certification document for admission into the Robocall Mitigation Database on the basis of its status as a voice service provider, updated its documentation as required by the FCC in the *Gateway Provider Order*, and submits this further updated document pursuant to the *Sixth Caller ID Authentication Report and Order*.

Information regarding Inteligent's voice service affiliates is set forth in Attachment A.

I. ENTITIES COVERED BY CERTIFICATION

The following entities are all subject to the robocall mitigation policies and procedures described in this document:

- ANPI Business, LLC
- ANPI, LLC
- Inteligent, Inc.
- Onvoy, LLC

¹ As described more fully in Section I, for the purposes of this submission, "Inteligent" refers to a number of related entities.

² See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (Mar. 17, 2023). See also *Wireline Competition Bureau Announces Robocall Mitigation Database Filing Deadlines and Instructions and Additional Compliance Dates*, Public Notice, WC Docket No. 17-97 (Jan. 25, 2024).

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- Onvoy Communications Limited
 - Onvoy Spectrum LLC
 - Sinch America Inc.
 - Voyant Communications, LLC

Onvoy, LLC is the direct or indirect parent of each of the other entities listed above, and all of these entities are subject to the same robocall mitigation plan. The ultimate parent of Onvoy, LLC is Sinch AB (publ), a publicly traded company. For the purposes of this document, these entities are collectively referred to as “Inteliquent.”

II. DESCRIPTION OF ROBOCALL MITIGATION PROGRAM

A. Efforts to Avoid Carrying or Processing Illegal Robocalls

Inteliquent has made meaningful investments to implement network upgrades and offer new features in order to combat carrying or processing illegal robocalls. All calls originated on, or that traverse, the network are subject to a robocall mitigation program with detailed practices reasonably expected to significantly reduce the origination, processing or carrying of illegal robocalls. Inteliquent deploys multiple systems to detect potential robocall activity based on statistics such as average call duration, Answer Seize Ratio (“ASR”) and call count carrier/consumer reports. Inteliquent also provides the following solutions on the Inteliquent network to help minimize the impact of illegal or unwanted robocalls on customers:

- **Know Your Customer/Know Your Upstream Provider:** Inteliquent has a “Know Your Customer Team” comprised of multiple employees. This team conducts “know your customer” and “know your upstream provider” vetting before it allows a party to become a new customer. Among other tests, the team will investigate the type of service being sought by the prospective customer and review the potential customer’s website to ensure that it has functional links and is not using fictitious names. Inteliquent’s KYC department also will determine whether potential customers have a concerning number of prior ITG traceback requests and may also reach out directly to US Telecom and other contacts throughout the industry to ask whether the

prospective customer is problematic. Inteliquent's KYC will research whether the prospective customer is located overseas (which would require meeting of Know Your Upstream Provider and International Gateway Policy requirements), and whether the FCC or the FTC have sent the prospective customer of individuals associated with the customer letters identifying them as involved in robocalling or spoofing. Additionally, Inteliquent's KYC team will ensure that a prospective customer is registered in the FCC's robocall mitigation database (and does not withdraw such registration) if the customer is classified by the FCC as a "provider." Any information that is provided to Inteliquent is compared to public information available either on the customer's website or through other internet-based resources.

- **Network Tools:** Inteliquent uses the following network tools to combat illegal robocalls:
 - **Randomizer:** Utilized for customer traffic which is sent to Inteliquent via a Least Cost Routing ("LCR") engine. Based on calling party telephone number analytics, an announcement is played to the calling party that requires the calling party to enter two randomly generated digits to complete the call. If the correct digits are not entered, the call will not proceed (machine generated calls presumably are unable to enter the randomly generated digits).
 - **Automatic Number Identification ("ANI") Management:** Utilized for customer traffic which is sent to Inteliquent via an LCR engine. ANI Management is used to identify and block originating telephone numbers from sending calls that are believed to be unlawful based on repeat attempts to reach the Inteliquent network.
 - **Proactive Blocking:** Applied to all traffic. Per rules adopted by the Commission, Inteliquent blocks calls from phone numbers on Do-Not-Originate ("DNO") lists from US Telecom, SOMOS and Neustar. In certain circumstances, Inteliquent also blocks calls that originate from invalid, unallocated, or unused numbers. Inteliquent's customers may also place certain of the inbound-only telephone numbers they use on the DNO list.
 - **No Treatment:** This treatment is applied to lawful robocalls so that they can complete. Call types eligible for this treatment include debt collections, political calls, surveys, non-profit, emergency notifications, and other lawful call types.
 - **Whitelist:** Inteliquent "whitelists" telephone numbers that it knows originate legitimate calls (i.e., are valid). For example, some law enforcement and emergency calls originate from numbers where the entire telephone number is composed of zeroes. While appearing to be an unallocated number, Inteliquent knows based on call history that the call is originating from a federal law enforcement agency or a local police department. Such calls also originate from older or misconfigured PBXs (private branch exchanges). Another example would be collection calls by Bank of America or calls to known numbers used for emergency county-wide or municipal alerts.
- **Teaming with Others:** Inteliquent works with other companies to stop unlawful robocalls. For example, Inteliquent has worked with "YouMail." From services that YouMail provides to its own

customers, YouMail creates a near real-time feed of telephone numbers being used unlawfully (typically associated with the “IRS” or similar scams). Inteliquent then monitors these numbers to take potential action. If Inteliquent recognizes that calls are being carried on its network that are originating from these numbers, then DNO treatment (as described above) will be applied. Inteliquent also regularly works with the Internal Revenue Service directly on complaints.

- **Contract Termination:** Inteliquent typically has contractual rights that allow it to terminate customers that violate relevant law, including violations of the Telephone Consumer Protection Act. When appropriate, Inteliquent enforces these rights. Subject to applicable laws that may prevent it from doing so, Inteliquent may also terminate accounts if it discovers that any of the entities or individuals associated with a customer account have been named by the FCC or the FTC as an illegal robocaller or have failed to respond to traceback requests.

As a gateway provider, Inteliquent does not have a direct relationship with a party that may be originating unlawful robocalls. Accordingly, when Inteliquent suspects it has identified unlawful calling, in addition to taking the steps identified above, it may also contact the party sending Inteliquent the calls (i.e., Inteliquent’s carrier/provider customer), and request that they work to investigate their customers (e.g., to identify the party sending them the calls, determine whether the calls are unlawful, and then to eliminate the source of the calling). At the same time, Inteliquent is aware of the need to balance any blocking and termination efforts with the goal of preventing the blocking of legitimate calls, particularly those that have a bearing on public safety or health (e.g., a school system sending an alert or law enforcement).

B. Traceback Requests

Inteliquent is a founding member of the Industry Traceback Group (“ITG”) sponsored by USTelecom. The ITG is a collaborative effort of companies across the wireline, wireless, VoIP and cable industries that actively trace and identify the source of illegal robocalls. Moreover,

Inteliquent also served on the Robocall Strike Force established by the Federal Communications Commission (“FCC”) in 2016 at the request of the FCC’s then-chairman, Tom Wheeler. The Robocall Strike Force was created to accelerate the development and adoption of new tools and solutions to

abate the proliferation of illegal and unwanted robocalls, to promote greater consumer control over the calls they wish to receive, and to make recommendations to the FCC on the role government can play to stop unlawful robocalls. Inteliquent commits to continue to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.

C. Commitment to Cooperate in Investigating and Stopping Illegal Robocallers

Inteliquent also promptly responds to inquiries from law enforcement and regulators, including the FCC, Federal Trade Commission (“FTC”) or state attorneys general seeking traceback or similar information. Inteliquent commits to continue to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use Inteliquent’s services to carry or process calls.

D. STIR/SHAKEN Compliance

Inteliquent has implemented STIR/SHAKEN to all egress traffic. In fact, Inteliquent is a leading industry proponent regarding the implementation of STIR/SHAKEN, including as a member of the board and certain committees of The Alliance for *Telecommunications* Industry Solutions (“ATIS”). Via ATIS, Inteliquent has provided input into the development of the industry guidelines for STIR/SHAKEN implementation. On May 29, 2020, Inteliquent submitted comments to the FCC in the FCC’s Further Notice of Proposed Rulemaking in the docket entitled *Implementation of TRACED Act, Section 6(a) — Knowledge of Customers by Entities with Access to Numbering Resources*.³ In its comments, Inteliquent supported the FCC’s efforts and made important suggestions to empower all providers in the call path with tools and solutions for endto-end call authentication. In particular, Inteliquent recommended that

³ Inteliquent Comments, WC Docket Nos. 17-97 and 20-67, at 1 (rec. May 29, 2020).

the FCC (1) pursue out-ofband STIR/SHAKEN as a “reasonable measure” to address call authentication when calls are not

all-IP and (2) promote the benefits of innovative solutions such as delegated certificates and pushing certificate signing authority closer to the source, which will enable a broader variety of voice providers to help authenticate calls.

Although its role as a gateway and an intermediate provider is somewhat unique, Inteliquent was a leader in implementing network features to allow the transit of header information. By so doing, it has allowed for the end-to-end implementation of STIR/SHAKEN for providers that have these capabilities. Indeed, Inteliquent, Comcast, and T-Mobile worked together to deliver the first end-to-end STIR/SHAKEN call across three networks.⁴

Finally, Inteliquent is also actively engaged in providing information to its customers to help them become STIR/SHAKEN compliant (for example, through webinars).

E. Third-Party Vendors for Call Analytics

Inteliquent uses the network tools described above to analyze the traffic it carries. Moreover, Inteliquent uses Neustar and First Orion as third-party vendors to perform additional call analytics.

F. Operating Company Numbers

- ANPI Business, LLC: 712J
- ANPI, LLC: No
- Inteliquent, Inc.: 559F, 542C
- Onvoy, LLC: 638C, 363F, 588J, 346K, 645J, 741E, 224C, 630H, 604E, 951H, 348F,

⁴ Press Release, T-Mobile, T-Mobile, Comcast and Inteliquent Deliver Industry First in War Against Illegal Call Spoofing (Nov. 21, 2019), <https://www.t-mobile.com/news/tmobile-comcast-inteliquent>.

065H, 630E, 668G, 649C, 273F, 026D 712H, 639C, 247H, 850D, 467H, 969E, 301H, 937C, 302H, 067D, 385J, 210H, 742E, 221F, 689F, 304H, 539H, 505B, 097D, 511H, 205F, 755H, 896E, 565H, 749E, 355H, 892D, 353H, 876D, 515H, 454F, 4899, 184D, 389H, 093F, 344J, 719E, 715G, 453F, 267H, 638E, 263F, 452F, 872G, 549E, 566H, 637E, 330H, 637C, 899G, 206F, 759G, 029F, 215F, 464C, 390H, 409F, 747G, 750E,

303H, 547E, 488H, 977E, 664H, 548E, 858G, 162G, 357J, 525E, 914G, 903C, 711G, 871E, 567H, 138E, 854H, 451F, 712G, 483E, 940E, 225C, 713H, 449F, 944G, 450F, 877G, 384C, 214F, 543C, 825F, 787F, 788F, 425G, 916D, 426G, 789F, 790F, 424G, 276D, 791F, 277D, 792F, 793F, 797F, 794F, 278D, 795F, 796F, 910D, 798F, 799F, 427G, 131D, 801F, 800F, 912D, 802F, 918D, 803F, 804F, 428G, 805F, 779F, 812F, 813F, 806F, 808F, 809F, 142D, 810F, 807F, 008D, 811F, 128D, 957G, 814F, 815F, 129D, 816F, 817F, 818F, 819F, 429G, 279D, 820F, 430G, 431G, 821F, 822F, 824F, 823F, 432G, 345H

- Onvoy Communications Limited: No
- Onvoy Spectrum LLC: 624H
- Sinch America Inc.: No
- Voyant Communications, LLC: 573J

Previous versions of Inteliquent’s plan included information about Onvoy, LTD. Onvoy, LTD has since become inactive and no longer provides voice or other services.

G. Information Regarding Principals and Related Entities

Attachment A of this document provides information regarding principals, affiliates, subsidiaries, and parent companies within the Inteliquent group of companies that provide voice services. For each such entity, Inteliquent provides the entity’s place of incorporation, director(s), officer(s), and information on its ownership. While the Commission has not specified the precise information to be provided on principals, affiliates, subsidiaries, and parent companies, Inteliquent submits that the information provided in Attachment A is more than sufficient to make clear that none of the Inteliquent entities or

their principals, affiliates, subsidiaries, or parent companies have been prohibited from filing in the Robocall Mitigation Database.

Attachment A

Information Regarding Inteliquent Principals and Related Entities Providing Voice Services

Corporate Information

ANPI Business, LLC

State of Organization: Delaware

Director: Brett Scorza

Officers:

Brett Scorza:	Chief Executive Officer and President
Julia Fraser:	EVP Americas
Brian West:	Chief Financial Officer
Richard Monto:	General Counsel and Secretary
Imad Al Ajarmeh:	Chief Network Officer
Bryan Bethea:	Chief Service Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Deb Sharrow:	Chief Accounting Officer
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Trust & Assurance Policy Director

Ownership: ANPI Business, LLC is 100% owned by ANZ Communications, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Corporate Information

ANPI, LLC

State of Organization: Delaware

Director: Brett Scorza

Officers:

Brett Scorza:	Chief Executive Officer and President
Julia Fraser:	EVP Americas
Brian West:	Chief Financial Officer
Richard Monto:	General Counsel and Secretary
Imad Al Ajarmeh:	Chief Network Officer
Bryan Bethea:	Chief Service Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Deb Sharrow:	Chief Accounting Officer
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Trust & Assurance Policy Director

Ownership: ANPI, LLC is 100% owned by ANZ Communications, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Inteliquent, Inc.

State of Organization: Delaware

Director: Brett Scorza

Officers:

Brett Scorza:	Chief Executive Officer and President
Julia Fraser:	EVP Americas
Brian West:	Chief Financial Officer

Corporate Information

Richard Monto:	General Counsel and Secretary
Imad Al Ajarmeh:	Chief Network Officer
Bryan Bethea:	Chief Service Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Deb Sharrow:	Chief Accounting Officer
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Trust & Assurance Policy Director

Ownership: Inteliquent, Inc. is 100% owned by Onvoy, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Minnesota Independent Equal Access Corporation

State of Organization: Minnesota

Director: Brett Scorza

Officers:

Brett Scorza:	Chief Executive Officer and President
Julia Fraser:	EVP Americas
Brian West:	Chief Financial Officer
Richard Monto:	General Counsel and Secretary
Imad Al Ajarmeh:	Chief Network Officer
Bryan Bethea:	Chief Service Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Deb Sharrow:	Chief Accounting Officer
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Trust & Assurance Policy Director

Corporate Information

Ownership: Minnesota Independent Equal Access Corporation is 100% owned by Onvoy, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Services Provided: Minnesota Independent Equal Access Corporation only provides Tandem Access Services.

Onvoy, LLC

State of Organization: Minnesota

Director: Brett Scorza

Officers:

Brett Scorza:	Chief Executive Officer and President
Julia Fraser:	EVP Americas
Brian West:	Chief Financial Officer
Richard Monto:	General Counsel and Secretary
Imad Al Ajarmeh:	Chief Network Officer
Bryan Bethea:	Chief Service Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Deb Sharrow:	Chief Accounting Officer
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Trust & Assurance Policy Director

Ownership: Onvoy, LLC is 100% owned by Onvoy Intermediate Holdings, Inc. Ultimately, this entity is owned by Sinch AB (publ).

Onvoy Communications Limited

Country of Organization: Ireland

Corporate Information

Company Registration Number: 37719510H

Directors:

Brett Scorza

Brian Cooper

Officers:

Brett Scorza: Chief Executive Officer and President

Brian West: Chief Financial Officer

Richard Monto: General Counsel and Secretary

Ownership: Onvoy Communications Limited is 100% owned by Onvoy Netherlands B.V. In turn, Onvoy Netherlands B.V. is ultimately owned by Onvoy, LLC. Further, the ultimate owner of this entity is Sinch AB (publ).

Markets Served: Onvoy Communications Limited holds several regulatory approvals to provide voice services in the European Union. Onvoy Communications Limited does not provide services in the United States.

Onvoy Spectrum, LLC

State of Organization: Delaware

Director: Brett Scorza

Officers:

Brett Scorza: Chief Executive Officer and President

Julia Fraser: EVP Americas

Brian West: Chief Financial Officer

Richard Monto: General Counsel and Secretary

Imad Al Ajarmeh: Chief Network Officer

Bryan Bethea: Chief Service Officer

Corporate Information

Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Deb Sharrow:	Chief Accounting Officer
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Trust & Assurance Policy Director

Ownership: Onvoy Spectrum, LLC is 100% owned by Onvoy, LLC. Ultimately, this entity is owned by Sinch AB (publ).

RadiantIQ LLC

State of Organization: Delaware

Director: Brett Scorza

Officers:

Brett Scorza:	Chief Executive Officer and President
Julia Fraser:	EVP Americas
Brian West:	Chief Financial Officer
Richard Monto:	General Counsel and Secretary
Imad Al Ajarmeh:	Chief Network Officer
Bryan Bethea:	Chief Service Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Deb Sharrow:	Chief Accounting Officer
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Trust & Assurance Policy Director

Ownership: RadiantIQ LLC is 100% owned by Onvoy, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Voyant Communications, LLC

Corporate Information

State of Organization: Delaware

Director: Brett Scorza

Officers:

Brett Scorza:	Chief Executive Officer and President
Julia Fraser:	EVP Americas
Brian West:	Chief Financial Officer
Richard Monto:	General Counsel and Secretary
Imad Al Ajarmeh:	Chief Network Officer
Bryan Bethea:	Chief Service Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Deb Sharrow:	Chief Accounting Officer
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Trust & Assurance Policy Director

Ownership: Voyant Communications, LLC is 100% owned by Onvoy, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Sinch America Inc.

State of Organization: Delaware

Directors:

Julia Fraser
Brian West
Robert Gerstmann

Officers:

Julia Fraser:	President
Brian West:	Chief Financial Officer and Treasurer

Corporate Information

Robert Gerstmann: Secretary

Ownership: Sinch America Inc. is 100% owned by Sinch US Holding Inc. Its ultimate owner is Sinch AB (publ).

Sinch AB's Directors:

Erik Fröberg

Björn Zethraeus

Lena Almefelt

Mattias Stenberg

Renée Robinson Strömberg

Bridget Cosgrave

Hudson Smith

Sinch AB's Officers:

Laurinda Pang:	Chief Executive Officer
Roshan Saldanha:	Chief Financial Officer
Brett Scorza:	Chief Technology Officer
Christina Raaschou:	Chief Human Resources Officer
Ilse van der Haar:	Chief Legal Officer
Jonathan Bean:	Chief Marketing Officer
Julia Fraser:	Executive Vice President Americas
Nicklas Molin:	Executive Vice President, EMEA
Sean O'Neal:	Chief Product Officer
Sibito Morley:	Chief Data and Transformation Officer
Thomas Heath:	Chief Strategy Officer
Wendy Johnstone:	Executive Vice President, APAC

Corporate Information

Corporate Information

Sinch UK Ltd.

Country of Organization: England **Company Registration Number:** 3049312

Directors:

Jan-Erik Svensson

Nicklas Molin

Officers: Not applicable (entity is director managed)

Ownership: Sinch UK Ltd. is 100% owned by Sinch Holding AB, which in turn is 100% owned by Sinch AB (publ).

Markets Served: Sinch UK Ltd. provides voice services in certain non-U.S. locations.

Sinch UK Ltd. does not provide services in the United States.

Sinch AB's Directors:

Erik Fröberg

Björn Zethraeus

Lena Almefelt

Mattias Stenberg

Renée Robinson Strömberg

Bridget Cosgrave

Hudson Smith

Sinch AB's Officers:

Corporate Information

Laurinda Pang:	Chief Executive Officer
Roshan Saldanha:	Chief Financial Officer
Brett Scorza:	Chief Technology Officer
Christina Raaschou:	Chief Human Resources Officer
Ilse van der Haar:	Chief Legal Officer
Jonathan Bean:	Chief Marketing Officer
Julia Fraser:	Executive Vice President Americas
Nicklas Molin:	Executive Vice President, EMEA
Sean O'Neal:	Chief Product Officer
Sibito Morley:	Chief Data and Transformation Officer
Thomas Heath:	Chief Strategy Officer
Wendy Johnstone:	Executive Vice President, APAC