



## **Robocall Mitigation Plan**

### **Business Information**

VONETO, LLC (DBA "Semperon")  
802 Kenmara Drive  
West Chester, PA 19380  
<http://voneto.com>, <http://semperon.com>

### **Contact Information**

Richard Kotch  
Director of Operations  
215-344-2266  
[rkotch@voneto.com](mailto:rkotch@voneto.com)

### **Overview**

Semperon is a reseller of IP based communication services which include hosted, managed and hybrid VoIP services. This Robocall Mitigation Plan is designed to outline how Semperon plans to achieve the requirements of "reasonable steps" taken to significantly mitigate and reduce the origination, termination, and processing of illegal robocalls.

### **Know Your Customer ("KYC")**

Semperon is a small company focused solely on providing IP Communication services to the small and medium-sized business market. Our customers are often referred to us by selective, known agents. This referral process along with our onboarding process enables us to have a strong understanding of the business, use case and overall goals of each customer. As a result, we have a deep understanding of each customer and their intended use of the services we provide them. In addition, we collect the following information during the onboarding of each customer:

- Business name
- Business address
- Primary point of contact – financial and operational
- Phone, email
- Signed service agreement.
- Payment information



## **Know your Upstream Providers**

Semperon works with the following upstream providers to deliver service to our customers. Both providers remain fully committed and remain fully compliant of STIR/SHAKEN and related Robo Mitigation efforts.

- Clearly IP, Inc.  
3255 W Highview Drive  
Appleton, WI 54914
- Limebox Networks, LLC  
5 Perina Blvd,  
Cherry Hill, NJ 08034

## **Acceptable Use Policy ("AUP")**

Semperon provides each new customer with a standard service agreement containing general policies, terms and conditions that require compliance with acceptable use policies. All customers are required to adhere to general and standard business use with any IP based communication services provided from us. In addition, the following areas are addressed as part of our policies:

- Customer must comply with standard business use of service.
- Customer may not wholesale service.
- Customer may only use authorized, purchased telephone numbers as part of outbound caller ID.
- Customer must agree to any required monitoring of network and usage traffic.
- Customer must cooperate with any suspicious activity and investigations.

## **Additional Security Measures Implemented**

Additional steps taken by Semperon to achieve compliance include:

- Educate and train staff.
- Monitor and update compliance.
- Engage with industry groups.
- Create customer awareness.
- Request from its upstream providers to enable maximum default call paths per customer.
- Create unique passwords for the phone system, including devices attached to the phone system.
- Closely monitor network activity for suspicious behavior.
- Enable analytics for real time dynamic traffic analysis.
- Implement blacklists to mitigate robocalls with specific attributes at a phone system layer.
- Rely on robocall prevention solutions offered by upstream partners which include reputation service, blocking and STIR/SHAKEN call authentication.



## Plan Updates

Voneto LLC will comply with FCC requirements by filing certifications in the Robocall Mitigation Database and detailing efforts to combat illegal robocalls. This also includes verifying that all 3<sup>rd</sup> party SIP vendors that provide SIP trunking services to Semperon customers have a complete STIR/SHAKEN caller ID authentication framework listed in the RMD. Semperon will maintain thorough documentation of all robocall mitigation practices and promptly report any issues or breaches to the appropriate authorities.

By adhering to this plan, Semperon aims to minimize legal risks and ensure compliance with regulations, while effectively mitigating robocalls and implementing robust prevention solutions.

Request for information or any questions may be directed to:

Richard Kotch  
802 Kenmara Dr.  
West Chester, PA 19380  
215-344-2266  
[rkotch@voneto.com](mailto:rkotch@voneto.com)



### Certification of Richard Kotch

I, Richard Kotch, Director of Operations at Semperon, do hereby certify, under penalty of perjury, the following:

1. All calls that originate on Semperon's network are subject to the robocall mitigation program, and meeting the requirements of "reasonable steps" for general mitigation standards to reduce the origination, termination, and processing of illegal robocalls.
2. Semperon has not had any violations.
3. Semperon is committed to responding within 24 hours to any requests made.
4. Semperon relies on each upstream provider to complete the full implementation of STIR/SHAKEN.
5. Semperon continues to do business as either "Voneto" or "Semperon" with address:

802 Kenmara Drive  
West Chester, PA 19380

6. Semperon has not had any other business names in use except for Voneto.
7. The name, title, department, telephone number and email address of the individual is listed in the above robo mitigation plan.
8. The following is a list of Voneto, LLC (dba Semperon) owners with more than 10% interest each/directors: Russell McFadden, Michael O'Donnell, THG Holdings, LLC.
9. None of the members in item 8 above have had their license denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
10. Semperon is not subject to a commission, law enforcement or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing by the FCC or been subject to an FCC enforcement proceeding.
11. Semperon is not a foreign voice service provider.

X 

Richard Kotch  
Director of Operations  
04/24/2024