

AURAVOX, LLC

ROBOCALL MITIGATION PLAN

Consistent with FCC regulations,¹ AuraVox LLC (“AuraVox”) submits this Robocall Mitigation Plan.

STIR/SHAKEN COMPLIANCE

Implementation Status. The 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 CFR § 64.6301(a)(1) and (2).

Extension. We rely on the continuing extension from STIR/SHAKEN implementation provided under 47 CFR § 64.6304(d) which exempts from STIR-SHAKEN Caller ID Authentication those portions of a voice service provider network that rely on technology that cannot initiate, maintain, carry, process, and terminate SIP.

Call Chain. We serve end-users as a voice service provider. We use Inteliquent, Inc. (d/b/a Sinch America) and Telnyx LLC, to ensure redundancy for our customers, as our third-party switch vendors and voice service providers, and they are tasked with executing the STIR/SHAKEN protocol for our network.

Traceback Requests. We respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls. We have designated a point of contact and that person’s name, title, address, phone number and email address are in the Robocall Mitigation Database portal.

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

EFFORTS TO PREVENT ILLEGAL ROBOCALL TRAFFIC

Investigation and Enforcement. Calls originating from and terminating to our network and identified by us, Inteliquent, Telnyx or other means as suspicious or atypical are investigated to determine if illegal robocalling has occurred. If it is determined that an AuraVox customer is using our network to originate illegal robocalls, we will warn the customer to immediately stop such practices or terminate their service as allowed per AuraVox policy.

Know Your Customer – Commercial. We diligently verify the identities of new commercial customers by gathering essential information, including the physical address, contact individuals, federal tax identification, and an understanding of the customer's business nature. This includes assessing whether and how they intend to use auto-dialers or similar robocall mechanisms in

¹ 47 C.F.R. §§ 64.6303-6305.

their operations. Our contracts and policies incorporate specific language aimed at mitigating robocalls, explicitly forbidding the use of our platforms for making or receiving unlawful calls. We conduct thorough evaluations of each customer.

Know Your Customer – Residential. We diligently verify the identities of new residential customers by gathering essential information, including name, physical address and social security number(s). Our contracts and policies incorporate specific language aimed at mitigating robocalls, explicitly forbidding the use of our platforms for making or receiving unlawful calls. We conduct thorough evaluations of each customer.

Risk Assessment. We are a voice service provider offering a variety of voice calling services. Our customers generally do not originate high volume calls and we have not received information suggesting that robocalls are originating on our network. Accordingly, we do not consider our network at high risk of originating illegal robocalls.

THIRD-PARTY PROVIDER

We have partnered with Inteliquent and Telnyx to provide voice services to our customers. These parties maintain the primary role of the following functions, among others, to assist us in meeting network-based robocall mitigation compliance:

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

In addition to the above robocall mitigation steps, Inteliquent, Inc. and Telnyx LLC have complete 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.

Updated December 23, 2024

EXHIBIT 1

ROBOCALL MITIGATION PLANS



Telnyx Robocall Mitigation Plan

V2.0

1 Robocall Mitigation Plan

Recent Author:	Olive Morris
Title:	Regulatory Affairs Associate
Contact:	Olive Morris, 803-341-1461, regulatory@telnyx.com & olive@telnyx.com
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Next Review:	1-year or until superseded

2 Document Control

2.1 Document Title: Robocall Mitigation Plan

2.2 Version History

1.0	5/14/2021	Fernando de Moura and Sarah Halko	Initial Version
2.0	1/26/2024	Olive Morris	Revised Version

2.3 Approvals

David Casem	CEO	5/14/2021	1.0
David Casem	CEO	02/26/2024	2.0

3 Overview

Telnyx LLC (“Telnyx” or “We”) is an interconnected voice over internet protocol (“VoIP”) provider with direct access to numbering resources pursuant to license from the Federal Communication Commission (“FCC” or “Commission”). Telnyx delivers voice, messaging, and other telecommunications and telecommunications-related services via a web-based platform and API to power global applications and next-generation communications. Telnyx primarily services large enterprises who wish to drive further automation and control over their business communications.

As an interconnected VoIP provider, Telnyx has closely followed the FCC’s implementation of the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act. Such implementation includes the required employment of STIR/SHAKEN caller ID authentication technology in the Internet Protocol (IP) portions of their networks.

Telnyx has certified in the Robocall Mitigation Database that it has fully implemented STIR/SHAKEN and has instituted a Robocall Mitigation program to ensure that Telnyx is not originating illegal robocalls. Telnyx also certifies that any prior certification has not been removed by Commission action and Telnyx have not been prohibited from filing in the Robocall Mitigation Database.

4 SHAKEN/STIR Compliance

Telnyx has fully implemented SHAKEN/STIR into our IP network. We are compliant with all relevant FCC Orders pertaining to caller ID authentication technology requirements and STI-GA policy mandates. Additionally, Telnyx actively participates in industry discussions at IPNNI, the SIP Forum, VON, and other forums to remain up to date on pending and accepted best practices and ensure compliance with FCC mandates.

5 Telephone Number Authorization

Telnyx’s Telephone Number (TN) authorization is primarily based on Telnyx’s direct assignment of a TN to our customer either via purchase on our portal or API, or successful port onto the Telnyx network. When originating a call, Telnyx checks the calling party number against Telnyx’s inventory and will provide appropriate attestation to the call based on industry standards and best practices.

Nonetheless, if a Telnyx customer wishes to use a TN as a caller identity and that Telnyx does not directly manage TN, then attestation adjustments can be made if the Telnyx customer meets the following conditions: they are an existing Telnyx customer, they can provide proof of a know your customer or TN validation process for their customers, and they have received no industry complaints (tracebacks, vendors, or subpoenas) in their tenure with Telnyx.

6 Acceptable Use Policy

All new subscribers are contractually obligated to abide by our Acceptable Use Policy (AUP)¹ and Terms and Conditions of Service² prior to accessing and using services.

Telnyx’s AUP clearly stipulates that our services cannot be used for illegal, improper, and/or inappropriate purposes. Illegal purposes include but are not limited to using any service in connection with the violation of or to violate any laws or engaging in threatening, abusive, harassing, defamatory, libelous, malicious, deceptive, or

¹ <https://telnyx.com/acceptable-use-policy>

² <https://telnyx.com/terms-and-conditions-of-service>

fraudulent behavior.

Among other improper and/or inappropriate uses, Telnyx's AUP includes sending unsolicited calls and messages (including, without limitation, commercial advertising and informational announcements) if aforementioned unsolicited activities could reasonably be expected to or do, in fact, provoke complaints.

Telnyx's Terms and Conditions state that if Telnyx receives a request from a traceback administrator authorized by the Industry Traceback Group for information about suspicious robocalls that have been sent to a downstream provider, the customer will promptly respond to the traceback request in good faith. Also, Telnyx may terminate the agreement, any service, or both immediately if the customer fails to comply with company policy upon becoming a Telnyx user.

7 Telnyx Customers, Monitoring, and Fraud Prevention

Telnyx collects contact and company information for each new customer upon sign-up. In line with our AUP and Terms and Conditions, Telnyx can leverage such contact information when we detect fraudulent call patterns to notify the customer of potential blocking or to pass such contact information to traceback administrators or law enforcement agents when necessary.

Telnyx takes the following steps to minimize the risk of fraud originating on our network. First, Telnyx blocks any subscribers who attempt to sign up with a "free-mail" account to reduce the risk of inviting bad actors onto our platform. Upon signing up with a valid e-mail, Telnyx customers are significantly limited to the amount of traffic they can originate from our platform. Suppose the customer wishes to increase their origination thresholds. In that case, they can apply for "level 2 verification," which includes a more in-depth review of the company's calling patterns, business model, and any previous complaints. Telnyx monitors traffic patterns, primarily tracking answer success rates ("ASR") and average call duration ("ACD"), by all new and existing customers and immediately takes steps to block the account if the patterns mentioned above reflect fraudulent activity. In addition to internal monitoring tools, we have implemented a third-party analytics provider (Nomorobo) that monitors traffic patterns through machine learning to alert our fraud team of suspicious activity or calling patterns. Telnyx currently blocks any originating call with an invalid ANI and is in the process of implementing the US Telecom DNO list to ensure we catch any potential fraudulent call from leaving our platform. In addition to calling patterns, Telnyx has implemented payment method tracking to block any customer with suspicious payment activities.

8 Investigation of Suspicious Activity and Traceback

Telnyx always communicates with new and existing customers to share the latest FCC orders and industry best practices for complying with robocall mitigation technologies and minimizing fraud origination on our collective networks. As such, we have encouraged all our customers to participate in US Telecom's Traceback group and have included these requirements in our services' Terms and Conditions. Telnyx actively participates in Traceback requests and ensures to respond within 24 hours to all such requests from the Commission, law enforcement, and the industry traceback consortium.

Any alert sent to Telnyx via our internal monitoring, tracebacks, and vendor alerts are properly reviewed by our fraud team, and a determination is made to remove the customer from our platform.

9 Blocking

Telnyx offers Inbound Call Screening to our customers, enabling users to flag and block unwanted incoming calls to maintain the integrity of their communications. Our Inbound Call Screening employs the SHAKEN/STIR attestation protocol to validate the authenticity of Caller ID information and includes two features – Enhanced Call Control and Spam Call Detection. With Enhanced Call Control, users can reject or flag suspicious calls based on customizable conditions. With our Spam Call Detection feature, users can effectively screen and identify potential spam calls to protect Telnyx numbers from unwanted solicitations and fraudulent activities, and avoid spam calls. As SHAKEN/STIR and other industry robocall mitigation efforts are implemented, we will be sure to monitor conditions for blocking fraudulent calls from reaching our customers.

10 Plan Updates

Telnyx's continued participation in various industry working groups will allow us to monitor updates to best practices and continuously improve our internal processes to ensure our Robocall Mitigation Plan continues to evolve with these threats.

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). .

- 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 end-to-end call authentication. In particular, Inteliquent recommended that the FCC (1) pursue out-of-band STIR/SHAKEN as a “reasonable measure” to address call authentication when calls are not

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

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, 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,

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>.

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 Inteligent 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).

Corporate Information

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
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).

Corporate Information

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

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.

Corporate Information

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).

Corporate Information

Onvoy Communications Limited

Country of Organization: Ireland

Company Registration Number: 3771951OH

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.

Corporate Information

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
Nick Reifschneider:	Vice President, Communications Service Providers
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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).

Corporate Information

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).

Corporate Information

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

Corporate Information

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
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

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:

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