



CDYNE Services, LLC DBA Esendex Robocall Mitigation Plan
mark.baughman@esendex.us

Overview

The FCC requires that all voice service providers certify in the Robocall Mitigation Database their status for compliance with STIR/SHAKEN. CDYNE takes its obligations to mitigate robocalls seriously. Pursuant to the Commission's rules, voice service providers must develop a Robocall Mitigation Plan that (a) details the reasonable steps taken to avoid originating illegal robocalls, (b) demonstrates a commitment to respond to traceback requests and cooperate with such entities in investigating and stopping any illegal robocalls, and (c) file with the Commission its Robocall Mitigation Plan.

Legal Requirements

CDYNE Services, LLC customers are subject to restrictions contained in its Master Service Agreement and Acceptable Use Policy requirements. Those requirements are available at <https://esendex.us/legal>. Customers must agree to the following prior to using any of CDYNE Services, LLC's services:

1. Represent and warrant that the services will be used in accordance with all applicable laws, including, but not limited to, laws governing invasion of privacy, libel, slander, or any other tortious or unlawful conduct.
2. Comply with all legal requirements regarding solicited and unsolicited advertising, marketing, and telemarketing, including the Telephone Consumer Protection Act and its implementing orders, Section 5 of the FTC Act, the Telemarketing Consumer Fraud and Abuse Prevention Act, the FTC Telemarketing Sales Rule and all similar state laws.
3. Agree that the services may not be used to promote or encourage any illegal activity or to engage in fraudulent activity.
4. Use the services to alter, deceive, or provide false information about the identity of the sender or the origin of a message or phone call.

Violations of the Master Service Agreement or the Acceptable Use Policy will result in immediate suspension or termination of the Services.

Customer Vetting

CDYNE Services, LLC utilizes a customer onboarding process to identify and deny any potentially fraudulent or suspected customers prior to the customer gaining access to its network. Such process includes (a) the name and address of the customer, (b) the state or county of residence, (c) the billing address, and (d) the use case for the services. Potential customers must agree to the Master Service Agreement and Acceptable Use Policy before they are permitted access to CDYNE Services, LLC's network. Before services can be rendered we require DBA Name, Vertical, EIN, EIN Country, Address, and website.

Operational System Monitoring

CDYNE Services, LLC has developed a custom in-house monitoring system across its network that identifies and flags calling patterns indicative of potential illegal robocalling. Such systems include sequential dialing, short duration, volume, and origination monitoring alerts enabling us to track suspicious call patterns. CDYNE Services, LLC additionally uses human review to audit and monitor potentially problematic traffic and to disable suspected customer accounts.

Enforcement

If CDYNE Services, LLC determines that a customer is originating prohibited unlawful robocalls on its network, it will immediately suspend the customer while it investigates the issue. If it is found that the customer was not in, or will not come into compliance with CDYNE Service's Acceptable Use Policy, CDYNE will terminate the customer in accordance with the Master Service Agreement.

Traceback

CDYNE Services, LLC is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocalls that it learns is using its services to originate calls. CDYNE Services will respond to any traceback requests within 24 hours of any request, in compliance with the standard outlined in *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixths Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18, at 18-19, para. 31 (Mar. 17, 2023), and has a policy in place to ensure responses are completed in as close to real-time as possible.

Mark Baughman Database Administrator,

mark.baughman@esendex.us