



Robocall Mitigation Program

Updated: April 2024

Southern Electronic Telephone, Inc. ("SET") is a small voice service provider reseller with less than 100,000 voice service subscriber lines. SET has implemented a Robocall Mitigation Program ("RMP") to include the obligations outlined in the Commission's recent release, In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97 (rel. March 17, 2023). In compliance with the Report & Order, SET submits this RMP and certification into the Robocall Mitigation Database ("RMD").

Steps to avoid originating illegal robocall traffic

SET is committed to cooperating with the Commission and its efforts to prevent and fight robocalling and fraud.

For this reason, we connect only local small businesses who we personally know. Almost all of them are long-time customers using our support for their phone systems for over a decade.

All new phone systems are installed and maintained by SET.

A session board controller (SBC) is used to connect the physical phones with the phone system and access to the system is limited to the IP address of the SBC. The outgoing Caller-ID is programmed by SET with the customer having no access to change that part of the programming.

Simultaneous outgoing calls are limited to a maximum of 4 to 8 calls, depending on the business size and the number of lines used before the transfer to SET's service.



Traceback

SET commits to responding fully and within 24 hours to all Traceback requests from the Commission, law enforcement, and industry Traceback consortium, and vows to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. SET will devote sufficient resources to provide prompt and complete information to traceback requests.

Our points of contact to handle all traceback requests are:

Raymund Meckler

Support Team

Raymund@settel.com

service@settel.com

SET utilizes the following procedures, working with its DID vendors, to conduct the investigations and to determine if the calls are actually illegal robocalls:

Originating Calls

For all incoming traffic, our DID vendors have fully implemented STIR/SHAKEN to sign the calls with full attestation and secure the identity of the calls to protect our end-users.

Outbound Calls

For all outgoing traffic, our termination Carriers have also fully implemented STIR/SHAKEN and sign calls with either A and/or B attestation to make our calls traceable back to us in the case of any abuse scenario.

Call Blocking / Monitoring

SET has access to all customer phone systems and analyzes and monitors all call traffic that originates on its customer-systems to identify behaviors that are consistent with illegal robocalling. If SET identifies such calling patterns, it will take appropriate action to address these situations, including blocking such calls.

We work closely with our DID vendors and terminating providers, we are able to collect call data from those providers as well as our own CDRs from our customers systems so that we can immediately block any calls originating within our customer systems that are identified as robocalls.



Know Your Customer (KYC)

SET has implemented affirmative, effective measures to prevent new & renewing customers from using its network to originate illegal robocalls, including knowing its customers and exercising due diligence in ensuring that its services are not used to originate illegal calls. SET connects only local small businesses who we personally work with. We verify the business entity, business activity and physical location of every customer. Almost all of them are long-time customers using our support for their phone systems for over a decade or even longer. SET has implemented Know Your Customer protocols when onboarding new customers. These protocols include:

- Visiting the physical business location and meeting the customer in person.
- Confirming the identity of new commercial VoIP customers by collecting information such as physical business location, contact person(s), state or county of incorporation, federal tax ID, and the general nature of the customer's business.
- Installing the system onsite and training all users.

Telephone Number Validation

All customers are required to supply an up-to-date invoice, specifically one that details the phone numbers under their ownership. This invoice should be no older than 60 days. Furthermore, to proceed, the customer must execute a Letter of Agency (LOA), which serves as a formal certification of their ownership of the telephone numbers intended for porting to SET.

Use Policy

SET has specific Terms and Conditions within the customer contract to aid its customers to understand the intended and permissible uses of our service, and to prevent exploitation, fraud, and abuse of our calling plans and features. These terms include a section on "unauthorized use of services" that allows SET to take the appropriate action it deems appropriate (to include blocking calls) to prevent any fraud or misuse of the network, which includes the detection of illegal robocalls.

SET submits this Robocall Mitigation Program consistent with FCC Regulations, 47 C.F.R. §64.6305 (a)(1) & (d)(5). SET will update its submission in the RMD within 10 business days of any change to the applicable information it must provide in the RMD, including its RMP.