

Sentinel Technologies, Inc.

Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Sentinel Technologies, Inc. (“Sentinel Technologies”) to mitigate and eliminate illegal robocalling. Sentinel Technologies has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Sentinel Technologies provides interconnected Voice over Internet Protocol (“VoIP”) calling services. All telecom services are provided on a resale-only basis. As a telecom reseller, Sentinel Technologies is dependent on our underlying provider’s assistance with monitoring their networks for fraudulent voice calling patterns. Our underlying VoIP provider is Intelepeer.

Know Your Underlying Provider

Sentinel Technologies, Inc. has a master service agreement with Intelepeer and has received written assurances from their officials that it has and will continue to sign calls submitted to Sentinel Technologies, Inc. and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Sentinel Technologies. Sentinel Technologies and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. Sentinel requires all subscribers to go through a contract process to collect information and does not allow ad-hoc service provisioning without this.

In our research of the prospect, Sentinel Technologies will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Sentinel Technologies’ strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Sentinel Technologies.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Sentinel Technologies as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Sentinel Technologies is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Sentinel Technologies will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Network Operations Center
800-860-8102

Our 24x7 NOC would be responsible for tracing the call and either disabling the service or working with the end customer to mitigate the issue causing the illegal calls. Sentinel Technologies commits to responding to traceback request from the Industry Traceback Group, the FCC, and law enforcement. We maintain call control packet capture logs, call logs and call detail records. VoIP trace and debug features can be utilized during investigations.

Telephone Numbers

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. We rely on our provider Intelepeer to ensure the end user is validated during the porting process. We do not intend to use a third-party verification service.

For subscribers with multi-line telephone systems, Sentinel Technologies and our underlying provider only allow calls to be connected if the originating number matches one of the TN’s assigned to the subscriber. This screening capability enables an automated and secure method of validating originating telephone numbers.

International Calling

Sentinel Technologies is not currently an international voice services provider. If at any time Sentinel Technologies does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

Upon notification of illegal traffic, we would investigate call logs and call detail records to determine the source. Our upstream provider Intelpeer also has various voice products utilizing different mechanisms to identify suspicious calling and would notify us in the event of suspicious or illegal traffic during their investigations.

Ongoing Robocall Mitigation

Our upstream provider Intelpeer has implemented SHAKEN/STIR. We would be notified if they detected illegal/robocall traffic coming from our network. Within our own network we utilize firewall rules and trusted ip's to ensure only vetted end customers, upstream providers, and vendors can connect voice traffic via our network. Customer telephone numbers are vetted during porting with our upstream provider Intelpeer.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns. Our 24x7 NOC would be responsible for tracing the call and either disabling the service or working with the end customer to mitigate the issue causing the illegal calls.

We rely on Intelpeer to perform call blocking from companies not registered in the RMD.

Sentinel Technologies Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

Network Operations Center
2550 Warrenville Rd, Downers Grove, IL 60515
800-860-8102
noc@sentinel.com