
Sequire LLC Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Sequire LLC (“Sequire”) to mitigate and eliminate illegal robocalling. Sequire 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.

Sequire provides hosted Voice over Internet Protocol (“VoIP”) calling services and other hosted and managed services. In compliance with § 64.6301(a)(1) and (2), Sequire has implemented the STIR/SHAKEN authentication framework on a portion of its network. Sequire uses Telonium for our Certificate Authority. Sequire has our own token, but Bandwidth is currently signing our calls. Our OCN is 786K.

Know Your Underlying Provider

Sequire’s business model is to host single-server and multi-tenanted systems in our data center and port the customers’ numbers to our carrier. We do not have underlying providers in the traditional sense. We do have partner providers that we work with, and we and our provider partners have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Sequire works with partners who have been well-established in serving their customer base. While Sequire does not always have a direct relationship with all end-users, we have strong working relationships with our partners who have strong relationships with their customers.

Based on these relationships, we most often know the physical location and nature of the customer's business on the front-end of enrolling them in our service. If a large volume increase is noted, we can communicate with our partners to ensure their business model has not changed.

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 Sequire as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Sequire 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. Sequire will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests are:

Jill Sprinkle

Customer Experience Manager

RMDtraceback@sequireit.com

Upon receiving a traceback request, an investigation will be conducted using call reporting tools. If the call is believed to have originated outside of the network, remediation steps will be taken to block the traffic from reaching our network. If the call is believed to have originated inside our network, remediation steps and/or disciplinary action towards the responsible party in accordance with our terms and conditions including possible suspension or termination of services.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Sequire immediately begins rejecting all traffic from the offending customer.

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. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Sequire and/or obtained by Sequire from Sequire's carrier partners for use by the subscriber.

Numbers can also be allocated by Sequire or ported away from their current carrier to us. This step includes submitting mandatory documentation including a signed Letter of Authorization allowing us to request the port and a copy of their most recent invoice from their carrier. Sequire does not use a third-party to validate the customers' information.

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International Calling

Sequire is not currently an international voice services provider. If at any time Sequire 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 carrier partners to perform the necessary telephone number validation on all international originated calls.

Call Analytics

Sequire presently relies on our underlying provider for call analytics.

Ongoing Robocall Mitigation

Sequire monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our partners detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities.

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.

Sequire Contact for Robocall Mitigation-Related Issues

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