



SUURV Inc.
10300 Heritage
San Antonio, Texas 78216

Re: Robocall Mitigation

To Whom It May Concern,

SUURV Inc. maintains voice services for a few of our clients. We do not approve of unsolicited robocalling or allow it on our voice networks. If robocalling was suspected to have been transmitted across our systems, we would be more than willing to immediately cooperate with regulatory and law enforcement agencies in investigations of abuses of our voice services and we have also put in place several protections to prevent our customers from making unsolicited robocalls and to prevent misuse of our systems by outside attackers.

Some of the systems we have in place to mitigate robocalls and other misuse of our voice networks are detailed below:

- 1.) We only provide outbound call origination for customers who also use our personnel to monitor and control their IT infrastructure. In other words, it is not possible for a random or anonymous user to simply sign up online and begin sending calls through our network. Becoming a customer and using our services requires individual meetings, generally in person, with the leadership of the company wishing to sign up for services and a clear understanding of the use which the customer will be making of our voice services. When the customer signs up for our services we then control their use of our voice network, and we must manually connect them to our voice network. I generally do this personally.
- 2.) We are no longer providing new customers with phone service on our systems. All clients who require phone services are now signed up directly with third party vendors, in part because of the excessive compliance and regulatory burdens associated with providing service.
- 3.) Our remaining telephone customer base is small. I believe we are only providing VOIP service for 3 customers at this point. These customers have about 20 users between them, and they process a few dozen calls a day cumulatively. A robocall campaign of any size would be a noticeable increase in our volume of calls and our cost of call origination.
- 4.) We maintain control of the PBX infrastructure connected to our system. We do not even give the login information for our customer's PBX systems to them. They cannot login and configure auto-dialers or robocall programs on their PBX because they cannot login at all. We also do not give them the extension "secret" for their individual extensions, so they are unable to register to an individual extension with a program or software and make robocalls via that method.

Before the next required filing in this FCC system, we will discontinue call origination services completely. Having to report to a federal agency under penalty of perjury simply to be allowed to help two non-profit organizations and restaurant save a little money on their phone service is not worth the hassle.

As a note, the previous form I submitted is attached to this one as page 2. This system deleted it when I added this page, so I've re-attached it.

Please contact me if you have any remaining concerns on this subject.

Steve Jordan
Chief Operations Officer
SUURV Inc.
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210-729-1200



SUURV Inc.
10300 Heritage
San Antonio, Texas 78216

Re: Robocall Mitigation

To Whom It May Concern,

SUURV Inc. maintains voice services for several of our clients. We do not approve of unsolicited robocalling or allow it on our voice networks. While we have not implemented the STIR/SHAKEN protocols we would be more than willing to cooperate with regulatory and law enforcement agencies in investigations of abuses of our voice services and we have also put in place several protections to prevent our customers from making unsolicited robocalls and to prevent misuse of our systems by outside attackers.

Some of the systems we have in place to mitigate robocalls and other misuse of our voice networks are detailed below:

- 1.) We only provide outbound call origination for customers who also use our personnel to monitor and control their IT infrastructure. In other words, it is not possible for a random or anonymous user to simply sign up online and begin sending calls through our network. Becoming a customer and using our services requires individual meetings, generally in person, with the leadership of the company wishing to sign up for services and a clear understanding of the use which the customer will be making of our voice services. When the customer signs up for our services we then control their use of our voice network, and we must manually connect them to our voice network. I generally do this personally.
- 2.) Our customer base is small. We have fewer than a dozen customers who originate calls through our voice services. Most of those customers have fewer than 20 phones. About half of the phone calls that we originate come from our own internal help desk team of 4-5 people who are making tech support calls to customers. We don't have millions of endpoints, or even thousands of them. We barely even have hundreds. A robocall campaign of any size would be a noticeable increase in our volume of calls and our cost of call origination.
- 3.) We maintain control of the PBX infrastructure connected to our system. We do not even give the login information for our customer's PBX systems to them. They cannot login and configure auto-dialers or robocall programs on their PBX because they cannot login at all. We also do not give them the extension "secret" for their individual extensions, so they are unable to register to an individual extension with a program or software and make robocalls via that method.
- 4.) We are shrinking our voice customer base. This makes it even less likely for someone to be able to originate robocalls on our system. We are currently moving our Help Desk to Cisco phone service. Because of this, the volume of calls we send will be cut drastically. Robocalling or other forms of abuse will then be even easier to spot.

Please contact me if you have any remaining concerns on this subject.

Steve Jordan
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