

Robocall Mitigation Plan

Overview

The FCC requires that all small voice service providers (“VSPs”) certify in the Robocall Mitigation Database that they have implemented a Robocall Mitigation Plan (“RMP”) to ensure that they are not originating illegal robocalls.

The FCC requires that VSPs develop a RMP that:

- details the reasonable steps taken to avoid originating illegal robocalls;
- demonstrates a commitment to respond to traceback requests to cooperate with investigators and stopping illegal robocalls; and
- is filed in the Robocall Mitigation Database.

The FCC states that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

SEMA Communications Ltd. (“SEMA”) is dedicated to stopping illegal calls from originating in our system and monitoring the calls coming into our system.

Know Your Customer (“KYC”)

SEMA’s KYC program involves obtaining specific subscriber information when the subscriber is onboarded. This process includes collecting such information such as:

- physical business location;
- contact person(s); and
- nature of the customer’s business.

SEMA maintains Master Service Agreement that subscribers must sign before permitted to use SEMA’s system.

Traffic Monitoring

SEMA maintains in-house system that monitors voice traffic to identify and block calling patterns consistent with robocalls.

SEMA also works with upstream carrier to perform dynamic traffic analysis and CDR analytics.

Traceback

We will promptly respond to call traceback requests from; the Commission, law enforcement and the traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers initiating calls.