

SD Tech – Robocall Mitigation Program (RMP)

Provider Roles

SD Tech provides enterprise VoIP/UCaaS to business customers as an originating voice service provider. If transiting third-party traffic, we additionally act as a non-gateway intermediate provider.

STIR/SHAKEN Implementation Status (Full Implementation)

SD Tech has fully implemented STIR/SHAKEN in the IP portions of our network. 100% of SIP-originated outbound calls are authenticated using SD Tech's own SPC token and certificate. SD Tech uses Bandwidth as a technical signer, but Bandwidth signs calls using SD Tech's certificate under SD Tech's direction. SD Tech—not Bandwidth—determines and assigns the attestation level (A/B/C) for each call. SD Tech does not originate traffic over any legacy TDM-only paths. SD Tech verifies inbound STIR/SHAKEN where applicable and monitors verification results for security and analytics purposes.

24-hour Traceback Commitment

We commit to respond within 24 hours to traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG).

Know-Your-Customer (KYC) Controls

We verify customer identity before enabling origination: government-issued business records, responsible party ID, address verification, domain verification, payment method validation, RTU checks for caller IDs, sanctions screening, risk scoring, and ongoing re-verification.

Attestation Policy

- A: When SD Tech assigned/validated the caller ID and KYC is complete.
- B: Verified customer identity but number not under our control.
- C: Transit of third-party traffic where identity/RTU are not fully verified.

Call Analytics & Blocking

We use Bandwidth analytics to detect and mitigate illegal traffic, and disclose Bandwidth as our analytics vendor. Traffic patterns, short-duration spikes, high failed calls, and consumer complaints are actively monitored.

Do-Not-Originate (DNO) Blocking

SD Tech blocks calls that present numbers on the Bandwidth-provided DNO list. DNO blocking is applied to all originated and transited calls.

Upstream/Downstream Vetting

We accept traffic only from providers with active RMD filings that have not been delisted. We routinely verify counterparties' RMD status.

Customer Redress & Blocking Notices

For analytics-based blocking, we return SIP 603+ codes and provide an appeal channel. Legitimate callers may request review/unblock within one business day.

Recordkeeping & Audits

We retain KYC artifacts, RTU evidence, attestation rationale, traceback correspondence, and mitigation actions for at least 24 months. Audits are conducted semi-annually.

Governance & Training

A compliance officer oversees the program, maintains 24x7 traceback coverage, and ensures teams receive annual robocall mitigation training.

Traceback Contacts

Primary: SD Tech Helpdesk, helpdesk@sd-tech.net, (210) 558-7385

Secondary: SD Tech Techsupport, techsupport@sd-tech.net, (210) 885-7057

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Certification Statement

SD Tech certifies that all calls we originate are subject to this robocall mitigation program, that we will respond within 24 hours to traceback requests, that we will keep our filing current (including naming Bandwidth as our analytics vendor and DNO source), and that we comply with FCC acceptance rules limiting traffic exchange to entities listed in the RMD. SD Tech further certifies that it has not been subject to any FCC enforcement action, investigation, or similar action in the past two years, other than the procedural compliance matter described in Appendix A.

Appendix A – Required Enforcement History Disclosure

Description of Prior Action or Investigation:

SD Tech was contacted by the Federal Communications Commission, Enforcement Bureau, regarding a compliance action related to our Robocall Mitigation Database (RMD) filing.

Agency Involved:

Federal Communications Commission (FCC), Enforcement Bureau.

Type of Action or Investigation:

Compliance review and removal notice from the Robocall Mitigation Database for failure to maintain a current and complete Robocall Mitigation Program on file, as required under 47 CFR § 64.6305.

Date Action/Inquiry Commenced:

August 25, 2025 (initial removal notification from the FCC).

Summary of the Issue Identified by the FCC:

The Enforcement Bureau determined that SD Tech's previous RMD filing did not include the required Robocall Mitigation Program documentation, resulting in removal from the database. No allegations of illegal robocalling, traffic pumping, consumer harm, or fraudulent activity were made.

Findings of Wrongdoing:

No findings of illegal robocalling or other statutory or regulatory violations were issued. The only finding was a procedural documentation deficiency.

Current Status:

SD Tech submitted a fully updated Robocall Mitigation Program and corrected all deficiencies. The company was provisionally reinstated into the RMD on August 27, 2025, and continues cooperating with the FCC to finalize reinstatement.

Final Determinations:

No final enforcement orders, monetary penalties, or adverse determinations have been issued. The matter remains an administrative compliance clarification pending full FCC confirmation of reinstatement.