

Seagull Network, Inc.

Robocall Mitigation Plan

1. Business Information

Name of Business: Seagull Networks, Inc. DBA SiteTurn Networks
Address of Business: PO Box 2136, West Sacramento, CA 95691
Description: Seagull Networks is a reseller of VoIP service. Our wholesale provider is Bandwidth.

2. Contact Information

Contact Person: Michael Miller
Title: Operations Manager
Address: PO Box 2136, West Sacramento, CA 95691
Phone: 916.441.6600
Email: noc@siteturn.com

3. Service Risk

Low Risk Level: Seagull Networks, Inc. provides VOIP services with only fully managed PBX option. The end user does not have the ability to manage the DIDs, Caller ID, Inbound Rules or Outbound Rules. Number of concurrent calls and volume are limited. Our technical staff, implement, monitor and completely manage the system configuration for all end point users. It is unlikely that illegal robocalls would initiate from this network.

4. Customer Profiles – Service Usage Monitoring

- a. **Know Your Customer:** The customers are only fully vetted businesses with a complete and detailed assessment on their need for the number of lines and volume of calls.
- b. **Call Volume:** Each customer has limits on simultaneous calls and per second calls, hard set when the account is setup for a customer.
- c. **Caller-ID:** End point customer is not in control of Caller ID. Caller ID is only set by our company support staff after verification for the Caller ID.
- d. **CDR Monitoring / Call Duration:** Customers call activity is routinely monitored and compared with prior/known usage history. Any changes are observed and reviewed by live staff members for any concerning activity anomalies.
- e. **Tracebak / Action:** Fully committed to respond to tracebak requests within 24 hours and cooperate with any/all involved authorities in investigation and efforts to stop illegal Robocalls.
- f. **Extension:** Seagull Networks uses bandwidth and is subject to the complete STIR/SHAKEN implementations by bandwidth. We obtain our DID numbers from Bandwidth.