

Robocall Mitigation Plan

Seamless Communication Systems, LLC
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Seamless Communication Systems, LLC (“Seamless” or “Company” is a VoIP service provider. The company and its customers are subject to the following rules regarding phone calls originating on the trunks and DID’s that are used on any system or device.

Know Your Customer

Seamless follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Traceback

The Company responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperate with such entities in investigating and stopping any illegal robocallers that use our service to originate calls.

Robocall Mitigation Program

The Company uses software & services provided by White Label Communications to monitor our outbound voice traffic in real-time to prevent the origination of illegal robocalls. Combining behavioral analytics, caller authentication and verification, our solution features:

- No Outbound calls can show an outbound caller ID that differs from a phone number owned by the Customer.
- No excessive Dialing or short Dialing (less than 6 second) is allowed.
- No outbound Auto Dialers can be used without express permission of Seamless and coordination and programming by the Company’s underlying provider.
- Any traceback requests from the FCC, law enforcement, or the industry traceback consortium will have full cooperation of the Company to stop or investigate illegal robocallers.
- Call Blocking Support: Accurate identification enabling subscribers to block fraudulent phone calls as per the TRACED Act (2019)
- Business Number Verification: Register legitimate business numbers to prevent unintentional call blocking.
- Caller ID Name Service: Easy integration of Caller ID name lookup service, including robocall mitigation with an override to include original caller ID even when a call is determined fraudulent.

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In addition, Seamless has implemented a Call Abuse Policy and publishes the following policy to its website, terms of use, and have notified our customers of the policy as copied below:

“Any call originated on the **Seamless Communication Systems** network is subject to inspection and investigation if the call is suspected of being fraudulent, abusive, or illegal. Calls meeting any of these criteria will be blocked. If these conditions are repeated, becoming excessive, the subscriber may be disconnected from the **Seamless Communication Systems** network, may be subject to further investigation by the FCC for enforcement of the TRACED Act and the subscriber may be subject to fines and penalties imposed by the FCC or the jurisdictional court.”