

Overview:

DID Logic Pte Ltd is an Foreign Voice Service Provider offering hosted PBX and SIP trunking to enterprises of all sizes along with termination services including support for dialer traffic. We serve end-users as well as VoIP aggregators and intermediate providers. Where the service is provided to the non-end-user (VoIP aggregator or intermediate provider), we review such cases individually with enhanced scrutiny and have complete information about the end-user subscribed. Our customers interconnect with us over the public internet using their own broadband service.

Know Your Customer:

Each DID Logic Pte Ltd customer must provide a physical business address, business registration, and name and contact information for at least one responsible individual. The business must have a web presence and contact email must be a domain dedicated to the business. Service Providers must have a current FCC 499A registration. Foreign customers must provide business registration and director's details. All customers must keep on file with us a current description of the type of calling they do. Customers claiming to be calling with consent must explain how that consent is obtained. We obtain sample recorded messages and verify that they comply with TCPA and TSR requirements. Payment must be done via credit card, PayPal or bank transfer. We cross-check and verify all these items and refuse to serve customers that are in any way suspicious.

DID Logic Pte Ltd shall not provide any VoIP origination, interconnect, and/or termination services to any prospective or existing customer without first engaging in a reasonable screening of such customer. For all existing customers, such reasonable screening must recur annually.

Such screening shall include, but not be limited to:

A. Requesting from each customer the following information:

1. The name of the customer;
2. The customer's country of incorporation and business registration or business license number; and
3. A description of the customer's business purpose and activities, including:
 - i. Whether the customer originates or carries conversational call traffic or intends to do the same as a customer of SITP.
 - ii. Whether the Customer originates or carries autodialed call traffic, or intends to do the same as a Customer of SITP; and
 - iii. Whether the Customer is engaged in telemarketing.
4. The physical address at which the Customer will conduct the business.
5. The name, address, and email address of the person responsible for payment on the Customer's account, and the form of payment to be used.
6. The name, physical address, email address, and telephone number for the business's owner(s). If the business is not directly owned by a natural person, then the name, physical address, email address, and telephone number for the natural person(s) who indirectly own(s) the business.
7. The name, telephone number, and email address of the Customer's employee responsible for compliance with U.S. state and federal laws prohibiting illegal robocalls,

and the Customer's policies and practices in terms of compliance with such laws and/or addressing illegal robocalls generally, including copies of any such written policies and practices.

8. The Customer's website and any social media page(s);

9. The Customer's IP address(es);

10. A list of all business and trade names, fictitious names, DBAs and related internet websites under which the Customer has transacted business for the previous three (3) years.

11. Whether the Customer has been:

i. Determined by US Telecom's Industry Traceback Group, in its sole discretion, to be a "Non-Cooperative Voice Service Provider"; or

ii. Blocked from another voice service provider's network after being determined to be a "bad-actor upstream voice service provider".

12. Whether the Customer (including the owner(s) or controlling person(s) of the entity) has ever had an adverse judgment against it in a civil lawsuit relating to the transiting of illegal robocalls.

13. Whether the Customer is implementing, or has implemented, the STIR/SHAKEN Authentication Framework (to the extent legally required).

B. Taking reasonable steps to review and assess the accuracy of the information provided, including but not limited to:

1. Reviewing the Customer's internet website(s) and social media page(s).

2. Reviewing public databases hosted by relevant state and/or federal/national governments that contain information about the registration or licensing of business entities in order to verify provided business registration/licensing information.

3. Performing reasonable internet searches about the Customer.

4. Matching the addresses provided, the Customer's website, and the geolocation of the provided IP-address.

5. Reviewing, on the FCC's website, any forms the Customer filed with the FCC).

6. Performing reasonable internet searches to determine if the Customer or its owner(s) have been the subject of publicly accessible law enforcement action(s) by any local, state, or federal government agency, and reviewing any such publicly accessible actions.

7. Performing additional reasonable diligence to resolve any concerns or suspicions raised.

Termination of services:

DID Logic Pte Ltd must immediately terminate any business relationship with a customer if a screening reveals that the customer:

1. Engages in Telemarketing but does not have a Subscription Account Number for accessing the DNC Registry.

2. Is offering VoIP telephony services, the provisioning and/or assignment of telephone numbers, or any other telecommunications or information services, without a current, valid Universal Service Fund registration number.

3. States it does not have a taxpayer identification number if it is a U.S.- domiciled company.

4. Has provided false, inaccurate, inconsistent, or misleading information in response to company's screening process and declined to correct that information upon request.
5. Refuses to provide any of the information requested.
6. Does not have a website or public social media page providing public information about its business.
7. Does not have an email address at the same domain name as its website.
9. Has been the subject of a total of three (3) or more Law Enforcement Agency's requests, or upstream or downstream carrier complaints sent to or shared with the Company.
10. Has been the subject of at least one (1) Traceback Request to the Company.

Rate Limits:

Conversational traffic and dialer traffic is segregated; we do not permit customers to mix traffic on the same trunk. All callers are limited in the number of outbound calls they can initiate per second and the number of concurrent calls allowed. These limits are set on a customer-by-customer basis based on conversational calling expectations given their business profile. Generally customers would be allowed maximum 20 simultaneous calls (channels) and would be able to initiate maximum 3 calls per second (CPS). These values can be increased progressively as we gain additional experience with the customer and always with extensive CDR monitoring. Volume of calls placed with consent of the called party must be consistent with the manner in which consent is obtained. Dubious claims are rejected and the customer is terminated.

Caller-ID:

We provide our customers with their telephone numbers (DIDs) or customers can port their numbers to DID Logic Pte Ltd if they choose. Callers are only permitted to use Caller-ID values that are assigned to the caller, or for which the caller has explicit permission from the number assignee to use. For dialer traffic, the customer must provide DID Logic Pte Ltd with a list of the Caller-ID values they will use. DID Logic Pte Ltd vets each number on the list before adding it to our switch. Calls that are not on the list for that customer will not be processed.

CDR Monitoring:

DID Logic Pte Ltd assesses each customer's traffic separately on a daily basis. We examine a set of metrics (number of call attempts, answer seizure ratio, average call duration, fraction of calls shorter than 60 seconds and shorter than 120 seconds). Traffic received on trunks designated for Conversational traffic must meet appropriate metrics (at least 20% of completed calls must be longer than 120 seconds). When dialer traffic is identified on a conversational trunk, the customer is notified; if the traffic continues for 72 hours, the customer is suspended. DID Logic Pte Ltd also looks for significant change from that customer's historic usage. Any anomalies result in immediate engagement with the customer to obtain a thorough, definitive explanation. If not resolved within 7 business days, the customer's service is suspended. For Dialer trunks, DID Logic Pte Ltd identifies for each customer the Caller-ID values that they are using for their calls (which must be on the allowed list of vetted numbers for that customer). Our Compliance team randomly calls a subset of numbers being used to ensure they are answered as expected per the customer's business description. DID Logic Pte Ltd has a zero-tolerance policy

regarding fraud. If fraud is detected, the customer is permanently banned from our network.

Traceback:

DID Logic Pte Ltd commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use Company's services to carry or process the calls. Any traceback results in an immediate detailed analysis of the initiating customer's CDRs for the past 30 days, followed by engagement with the customer to explain anomalies in the CDRs as well as the specific traceback example. A customer that is the subject of one traceback is permanently banned from our platform.

Extension:

Because we cannot today get an SPC token, DID Logic Pte Ltd is subject to a STIR/SHAKEN implementation extension. DID Logic Pte Ltd does not have direct access to numbering resources; we get our numbers via another wholesale providers.