

## Smartkalls INC Robocall Mitigation Efforts

### Traceback

1. **Smartkalls INC** commits to respond to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls, and that none of the voice traffic that originates on its network is currently authenticated with STIR/SHAKEN and instead that all of the voice traffic that originates on its network is subject to this robocall mitigation program.
2. **Smartkalls INC** will block services to a customer if it determines that the customer is using the services for illegal robocalling.
3. **Smartkalls INC** will only accept traffic for termination from companies that are in the Robocall Mitigation Database after September 28, 2021.

### STIR/Shaken Extensions

**Smartkalls INC** is a small voice service provider, serving fewer than 100,000 voice service subscriber lines and therefore qualifies for an extension of STIR SHAKEN Implementation under 47 C.F.R. §64.6304(a), which reads:

§64.6304 Extension of implementation deadline.

(a) Small voice service providers.

(1) Small voice service providers are exempt from the requirements of §64.6301.

(2) For purposes of this paragraph

(a), “small voice service provider” means a provider that has 100,000 or fewer voice service subscriber lines (counting the total of all business and residential fixed subscriber lines and mobile phones and aggregated over all the provider's affiliates).

## KYC Process

### ROBOCALL MITIGATION AND KNOW YOUR CUSTOMER QUESTIONNAIRE

Smartkalls INC is committed to compliance with the Telephone Customer Protection Act (TCPA), the TRACED Act (Telephone Robocall Abuse Criminal Enforcement and Deterrence) and the rules of the Federal Communications Commission pertaining to the prevention of illegal robocalling, fraudulent calling and other illegal use of its network. To that end, Smartkalls INC requires each customer to complete the following questionnaire to enable Smartkalls INC to properly conduct the necessary due diligence to comply with the law and protect its network.

For purposes of this form, the “Customer” is the entity subscribing to services from Smartkalls INC.

#### SECTION A

| Question                                                                                                                                       | Response |
|------------------------------------------------------------------------------------------------------------------------------------------------|----------|
| If Customer is an entity, what type of entity (corporation, LLC, etc.):                                                                        |          |
| Customer name, including all trade names, fictitious names and DBAs under which Customer has transacted business for the previous three years: |          |
| State or country of formation:                                                                                                                 |          |
| Federal taxpayer identification number (EIN) for US domestic entities only:                                                                    |          |
| 499 filer identification number for US entities :                                                                                              |          |
| Business license or registration number and the name of the government entity that administers such registration or license:                   |          |
| A description of Customer’s business, including whether                                                                                        |          |

|                                                                                                                                                                                |  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Customer uses our auto-dialer and engages in which telemarketing campaign:                                                                                                     |  |
| Physical address of Customer's business:                                                                                                                                       |  |
| Name, physical address, email address and telephone number of the person responsible for payment of Customer's account with Smartkalls INC and the form of payment to be used: |  |
| Name, physical address, email address and telephone number of the natural persons who directly or indirectly own the Customer:                                                 |  |
| Name, telephone number and email address of Customer's employee responsible for compliance with US state and federal laws pertaining to illegal robocalls:                     |  |
| Websites and any social media pages used by Customer currently and over the past three years (leave blank if none):                                                            |  |
| Customer's current IP addresses and any IP addresses used by Customer over the past three years:                                                                               |  |
| Customer's list of ANI's for Calling if they are calling in US/Canada                                                                                                          |  |

Has Customer (or its owners or controlling persons) have ever had an adverse judgment against it in a civil lawsuit relating to illegal robocalling? ☐ Yes ☐ No

## SECTION B

By signing below, Customer represents and warrants to Smartkalls INC, and agrees to the following. If Customer is not reselling the services of Smartkalls INC but instead will use them for its own

The undersigned is an officer of Customer with authority to execute this questionnaire and bind Customer to the provisions herein and further certifies that the information set forth above is complete and accurate the knowledge of the undersigned after reasonable inquiry

Customer Name:

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Signed by (print name):

Title:

Date

ROBOCALL MITIGATION AND  
**KNOW YOUR CUSTOMER ONBOARDING CHECKLIST**

Customer Name: \_\_\_\_\_

Due Diligence

- ☐ Robocall Mitigation and Know Your Customer Questionnaire Received
- ☐ Customer contacted by telephone to confirm its service description and accuracy of information provided
- ☐ Customer website and social media pages reviewed (if any)
- ☐ Unless Customer is an individual, Customer name search conducted in state of formation to verify active status
- ☐ Internet search conducted using Customer name and names of all owners
- ☐ Identified IP address location and it is not foreign for the Customer
- ☐ Conducted 499 filer ID search using Customer's name (if any)

Screening Results

Customer has provided all material information and documentation requested.

☐ Yes ☐ No

All information reviewed is correct as reported by Customer.

☐ Yes ☐ No

If Customer is an entity, Customer is registered as a business with the state or country of its principal place of business.

☐ Yes ☐ No

Customer has an EIN (if a domestic US entity), a website and an employee responsible for legal compliance prohibiting illegal robocalling or compliance policies pertaining to robocalling.

☐ Yes ☐ No

There are no irregularities or contradictory information in Customer's public filings.

☐ Yes ☐ No

For wholesale customers:

We don't provide services to whole sale customers we manage CC traffic of our users on our own hosted dialers/PBX. We directly provide services to end users only with verified called back ANI's

.By: \_\_\_\_\_

Name: \_\_\_\_\_