

SADOS MSP, INC. Robocall Mitigation Compliance Plan

SADOS MSP, INC. (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate or transit calls into the United States and territories.

Implementation of STIR/SHAKEN

The Company has fully implemented the STIR/SHAKEN call authentication framework, as required by the TRACED Act, to ensure the integrity of caller ID information.

Response to Traceback Requests

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, TPTG, the FCC, and law enforcement. The Company will cooperate with these groups to investigate and stop any illegal robocallers from using the Company’s service. When notified by the FCC’s Enforcement Bureau, the Company shall block and report identified illegal traffic and any substantially similar traffic on an ongoing basis (unless the Company’s investigation determines that the traffic is not illegal). If the Company determines the traffic is not illegal, it shall provide the Enforcement Bureau with an explanation and the steps taken to reach this conclusion.

Analytics and Robocall Detection Systems

The Company utilizes a combination of internal tools and third-party analytics systems provided by its upstream providers to detect and prevent illegal robocalls. This includes:

1. Monitoring the network to identify suspicious traffic patterns.
2. Detecting and investigating irregular and unexpected calling patterns.
3. Using data analytics to identify calls from invalid phone number formats, area codes, unassigned number blocks, and Do Not Originate (DNO) numbers.
4. Limiting customers' capacity via call-per-second limits and/or concurrent session limits.
5. Conducting Know Your Customer (KYC) verifications for all new accounts.

Use of Third-Party Analytics Vendors

The Company relies on analytics systems provided by its upstream providers to support its robocall mitigation program. Specifically:

- **Upstream Provider:** PayG LLC dba SkySwitch
 - **Description:** Provides integrated analytics tools and systems for monitoring and identifying illegal robocall traffic.

These solutions complement the Company’s internal systems, ensuring a robust and comprehensive approach to mitigating illegal robocall traffic.

Customer Verification and Risk Management

All new customers undergo a thorough verification process that includes:

1. Electronic and manual verification systems.
2. Credit reviews and references from trusted industry members.
3. Restrictions on new accounts until verification processes are completed.

The Company reserves the right to refuse traffic from any party at any time where robocalling or use of invalid or unauthorized originating numbers is suspected. This includes the ability to block originating numbers, terminating numbers, specific trunks, or customer accounts entirely to prevent such traffic from transiting the Company's network.

Upstream Providers

The Company receives voice traffic from the following upstream providers:

- **PayG LLC dba SkySwitch**
 - Address: Arborcrest 1, 751 Arbor Way, Suite 150, Blue Bell, PA 19422
 - Phone: 747.777.8100
 - Email: support@skyswitch.com
- **CoreDial LLC**
 - Address: Arborcrest 1, 751 Arbor Way, Suite 150, Blue Bell, PA 19422
 - Phone: 215.297.4400
 - Email: cdsupport@skyswitch.com

Contact and Ongoing Updates

Filers are required to update information submitted to the Robocall Mitigation Database within ten (10) business days of any changes. The Company will ensure that all contact and other information remains current and accurate.

Compliance

The Company is committed to adhering to all FCC regulations, including the filing and maintenance of an accurate robocall mitigation plan in the Robocall Mitigation Database. Any updates required by the FCC will be promptly implemented.

This plan is submitted in compliance with 47 CFR § 64.6305 and addresses all content requirements specified in the FCC's recent Public Notice (DA 24-73).