



STI Connect, Inc. Robocall Mitigation Compliance with TRACED Act

About the Company

STI Connect, 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 calls or transit calls into the United States and territories.

The company is a small switchless reseller of VoIP telephony services to business customers.

VoIP telephony is not, nor will it ever be the main focus of business for the Company as the Company does not actively engage in distinct marketing plans and campaigns to sell services regionally or even nationwide.

The Company primary place of business is:

Street: 338 County Road 411
City, State, Zip: Proctorville, Ohio 45669
Main Number: 740-886-9000
General email address: administrator@stinetworks.net

Leaders of the company are:

CEO:

Name: Cathy Hysell
Street: 338 County Road 411
City, State, Zip: Proctorville, Ohio 45669
Direct Dial: 740-886-3302
Email Address: cathy_hysell@stinetworks.net

Designated RMD Contact:

Name: Jeffrey Wente
Street: 338 County Road 411
City, State and Zip: Proctorville, Ohio 45669
Direct Dial: 740-886-3309
Email Address: jeffrey_wente@stinetworks.net

The Company has fully implemented STIR/SHAKEN

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robo-callers from using the Company’s service to carry or process illegal calls.

When notified by the FCC’s Enforcement Bureau, Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau.

If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company's networks. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call per second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- All new customers are verified with a combination of electronic and manual verification systems, credit reviews, and previous experiences with customer executives and employees. The Company severely limits the capabilities of new accounts until these appropriate processes are complete.

Upstream Providers

STI Connect is using switch services and provisioned platforms from SkySwitch and CoreDial and has two upstream providers from which it receives voice traffic:

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

The Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer service, including termination of customer relationship, to prevent robocalling, invalid originating number or spoofed origination number transiting the Company's networks.

Know Your Customer

The Company has a KYC policy in order to support the Business Customers that it sells and resells services to. The Company has a presales process where representatives of the Company work with the prospect or customer to understand all the unique factors of the Customer's business. The objective of this is twofold: a) to get to know the customer; and b) to provide the best possible service to the customer by fully understanding all facets of their business. The information gathered is stored in the customer's records.

The Company performs a credit check on each of its customers and verifies the following information: legal business name, legal form of business, federal tax ID, nature of the business, primary contact person, and service address.

Not only does the Company have a rigorous intake and onboarding process where it secures extensive information for Customers but all relationships between the Company and customers are governed by an MSA which specifically states the business Customer is not able to resell any services which the Company resells and the services which are sold to the Customer are strictly for the Customer's own internal use.

Company Declaration

The Company certifies that it has never been under investigation or committed any violations within the last two years with any local, state, or Federal agency or equivalent related to telemarketing or robocalling. Additionally, the Company is not currently subject to a formal action or investigation due to suspected unlawful robocalling or spoofing.

If, when, and as the Company business may change, designated Company representatives only will update this RMP as appropriate.