

SCS COMMUNICATIONS, LLC

Robocall Mitigation Compliance Plan (RMP)

Compliance with the TRACED Act

SCS Communications, LLC (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 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 robocallers from using Company’s service to carry or process illegal calls.

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 Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau.

If the Company determines that the identified traffic is not illegal, the Company shall provide the Enforcement Bureau with an explanation as to why the 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, references from trusted industry members, 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

SCS Communications, LLC is using switch services and provisioned platforms from **PayG dba SkySwitch** and receives voice traffic from the following upstream providers:

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

3. Bandwidth.com CLEC, LLC

900 Main Campus Drive
Raleigh NC 27606
Phone: 919.704.3069
Email: voicesecurity@bandwidth.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 they are not authorized to use has occurred or is suspected.

The Company is able to block the originating number(s), terminating number(s), trunk(s) or customer, including termination of customer relationship, to prevent robocalling, invalid originating number use, or spoofed origination number transiting the Company's networks.

Company Information

SCS Communications, LLC

1 Hardy Road, Suite 210

Bedford, NH 03110

Phone: **603-660-5598**

Website: SCSCCommunications.com

Company Leadership and Designated RMD Contact**CEO**

Jack Miller

1 Mayflower Dr.

Bedford, NH 03110

Phone: **603-660-5598**

Email: compliance@scscommunications.com

Designated RMD Contact

Jack Miller

1 Mayflower Dr.

Bedford, NH 03110

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Email: compliance@scscommunications.com

Know Your Customer (KYC)

The Company has a rigorous Know Your Customer (KYC) policy in order to support the business customers that it sells and resells services to.

The Company has an in-depth presales process where representatives of the Company work with the prospect or customer to understand all 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 Company performs a thorough 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
- Service address

All relationships between the Company and customers are governed by a Master Service Agreement (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 and when the Company's business changes, designated Company representatives will update this Robocall Mitigation Plan as appropriate.