

KYC Review Policy

Overview

As a registered carrier, Skyetel is obligated to conduct routine K.Y.C. (Know Your Customer) reviews in order to insure that our network is not providing an avenue for robocallers and fraudsters to illegally call consumers. These reviews are mandated by the FCC, and we are required to routinely conduct them by law.

If your account is subject to a KYC review, don't worry. They are usually routine, and can be settled within a matter of minutes. Almost all of our KYC reviews simply require an additional piece of information or a simple explanation as to the type of traffic you are sending us. Don't panic :).

If you refuse to complete a KYC review with us, your account will be immediately closed.

KYC's Purpose

The reason the FCC requires us to conduct regular reviews of our accounts is because they are cracking down hard on robocallers. The idea is that if every carrier (VoIP or otherwise) knows who their RoboCallers are, they can work toward stopping them. Additionally, the purpose is to also increase the liability on carriers who profit from RoboCallers. If they are at risk of having their licenses revoked, they will not be as accommodating – or so the logic goes.

Should You Worry?

In a word, no. This is routine and the likelihood of having your account closed is very low so long as you're not a RoboCaller or breaking the law.

Know Your Customers

KYC Thresholds

KYCs have automatic triggers that cause your account to be reviewed. If you trigger any of these notices, your account is flagged and reviewed by our accounts team:

- Your account was hit with [Surcharges](#)
- You placed more than 50,000 outbound calls in a single month
- Your outbound traffic is significantly higher than your inbound traffic
- Your traffic has a high call per second initiation rate
- We receive a traceback or subpoena related to traffic on your account
- There was suspicious activity in our portal
- Your account was selected at random

In most cases, we are able to identify our customers based on information they have already provided us. For example - we will review the domain associated with your email to find what company you are associated with. We then will look that company up your state's corporation database to insure it is valid.

In some cases however, we will contact you so that you can help us have current information associated with your account. In these cases, you will be asked to complete a questionnaire and sign a DocuSign. In some cases, we may ask for you to upload identifying information such as a driver's license, IRS EIN letter, FCC License etc. This information is kept secure and is only used to comply with FCC regulations.

KYC Outcomes

If we reach out to you for a KYC review, there are 3 possible outcomes:

KYC Pass

We will thank you for your time, and apologize for the inconvenience. Nothing will change on your account :).

Example – You are a car dealership that just makes a lot of phone calls.
Nothing to see here!

KYC Soft Fail

We will work with you to correct the root cause of the KYC fail. In most cases, this is simply a matter of missing paperwork or inconsistent information. In the case of a KYC soft fail, we will provide you with a deadline for corrective action to be complete.

Example – You did not enroll in the [Robocall Mitigation Database](#), and we will require you to do so.

KYC Hard Fail

If your review results in a hard fail, we will close your account immediately. Unfortunately, this decision is final and is not appealable.

Example – You were found to be part of an IRS scam.

KYC Examples

Example 1: A growing business

Academy Dealership is a growing car dealership. Recently, the sales manager launches a program where a sales agent receives extra comission for every car they sell during that month. This excitement creates an unusual spike in outbound calls that causes the account to be flagged.

Skyetel Action:

After a review, Skyetel marks the account as normal, and nothing more needs to be done.

Example 2: A collections agency

Salt Collections is a collections agency for credit card companies. Due to the nature of their business, they make a large number of outbound calls and hit the surcharge trigger. All of these calls are carefully controlled to be within the requirements of the TCPA and state regulations, but they went overboard on how many concurrent calls they were able to support.

Skyetel Action:

Skyetel contacts Salt Collections and asks them to complete a DocuSign. Due to the nature of the type of business, we will ask for an upload of identifying information. After the DocuSign is complete, the account is marked as normal.

Example 3: A VoIP Reseller

Persephone Telecom is a VoIP service provider with relationship pricing. They got a little busy, and missed the requirement that they must be registered in the Robocall Mitigation Database. As per FCC regulations, we are not allowed to transit traffic for Telecom Services Providers unless they are registered in the Robocall Mitigation Database.

Skyetel Action:

Skyetel contacts Persephone and asks them to enroll in the Robocall Mitigation Database and complete a DocuSign. Once complete, the account is cleared, we apologize for the annoyance, and life continues like normal.

Example 4: A fraudster

Raymond Reddington is a crafty criminal who managed to create an account on Skyetel. He begins to make a lot of outbound calls out of nowhere without first contacting our sales department or responding to requests for information.

Skyetel Action:

Account is closed.

KYC and Your Privacy

We know that asking to complete a KYC verification feels uncomfortable. It is important to note that Skyetel does not share the information we collect from you during a KYC with any third parties unless we are compelled to by a court order (which has only happened once in the 8 years we've been around). The information we collect is kept secure, and is only used to comply with our federal requirements.