

Robocall Mitigation Program Description

1. Company Overview

Seoplana LLC is a reseller of voice services and does not originate calls on the public switched telephone network (PSTN). As a reseller, our business model involves purchasing voice services from upstream providers and offering them to end-users or other businesses without direct involvement in call origination. We do not provide direct access to telephone number assignments or facilitate outbound calling independent of our upstream carriers.

2. Compliance with Upstream Providers

To ensure compliance with robocall mitigation regulations, Seoplana LLC exclusively partners with upstream carriers that fully implement STIR/SHAKEN protocols. Our providers authenticate calls at the origination level, ensuring that traffic passing through our network meets regulatory and industry standards. We verify that all upstream providers are registered in the FCC's Robocall Mitigation Database and maintain compliance with 47 CFR § 64.6301(a).

3. Robocall Monitoring and Prevention

While we do not originate calls, Seoplana LLC actively monitors traffic passing through our network to detect and prevent illegal robocall activity. Our mitigation efforts include:

- Partnering only with STIR/SHAKEN-compliant carriers.
- Requiring customers to agree to strict acceptable use policies (AUPs) that prohibit robocalling.
- Implementing automated and manual review processes for abnormal call patterns.
- Utilizing call analytics and fraud detection tools provided by our upstream carriers.
- Conducting periodic reviews of customer accounts and terminating services of any clients found to be engaging in illegal robocall activity.

4. Response to Complaints and Traceback Requests

Seoplana LLC is committed to cooperating fully with law enforcement agencies, the FCC, and the Industry Traceback Group (ITG) to investigate and mitigate illegal robocall activity. Our response procedures include:

- A dedicated compliance team to handle traceback requests.
- Providing requested records and data to regulatory authorities within 24 hours of receiving a request.
- Taking immediate corrective action against any customers or partners found to be in violation of robocall mitigation policies, including suspension or termination of services.

5. Collaboration with Authorities and Industry Partners

We actively engage with industry groups, regulators, and partners to stay informed on best practices for preventing illegal robocalls. As part of our compliance efforts, we:

- Maintain documentation on all upstream providers and their STIR/SHAKEN compliance status.
- Regularly update our robocall mitigation policies to reflect changes in FCC regulations.
- Participate in industry discussions regarding call authentication, fraud prevention, and robocall mitigation.

6. Conclusion

Seoplana LLC is committed to ensuring that its network does not facilitate illegal robocall activity. By exclusively working with compliant upstream carriers, monitoring traffic for anomalies, enforcing strict customer policies, and cooperating with authorities, we meet the obligations of the FCC's robocall mitigation framework while remaining exempt from direct STIR/SHAKEN implementation.

Declaration:

This document is submitted in compliance with FCC requirements and accurately reflects our

company's robocall mitigation practices. If any regulatory updates require modifications to our program, we will implement and document these changes accordingly.