

Robocall Mitigation Program Policy

Pre-Production Filing (Facilities Ready; No Live Traffic)

Company: Sent, Inc.

FRN: 0035530567

Date of Filing: July 24, 2025

1. Provider Overview

Item	Detail
Legal name	Sent, Inc.
FRN / OCN	0035530567 / 126L
Service role	Voice Service Provider acting as a wholesale originator of calls
Network type	100% SIP/IP; no non-IP facilities
STIR/SHAKEN status	Will be fully implemented at launch; Sent will sign every originating call and will verify every terminating call.

Operational Status (as of filing date).

Sent, Inc. has **not gone live with customer traffic** and is conducting only internal lab calls over non-public test numbers. All STIR/SHAKEN signing infrastructure, KYC workflows, and analytics engines described below are fully built in a staging cluster and will be cloned to production **no later than 30 days before commercial launch (target Q4 2025)**. Sent will **update this Robocall Mitigation Database (RMD) filing within ten business days of initiating public traffic** in accordance with FCC 24-135.

2. Regulatory & Standards Framework

Sent's program is designed to meet:

- **47 C.F.R. §§ 64.6300-64.6305 (Caller-ID Authentication & Robocall Mitigation)** – including the duty to take “*reasonable steps to avoid originating illegal robocall traffic*” and to respond to traceback requests within 24 hours.

- **47 C.F.R. § 64.1200(n)(4)** – the affirmative obligation to “*know its customers and exercise due diligence.*”
- The **TRACED Act** (2019) and subsequent FCC enforcement guidance.
- Industry STIR/SHAKEN specifications (ATIS-1000074, ATIS-1000080) and the STI-GA/PA governance model.

3. STIR/SHAKEN Implementation & Attestation Policy

3.1 Technical Architecture

- **Signing Platform.** Upon launch, Sent’s Session Border Controllers (SBCs) **will insert** SIP “Identity” headers for all originating traffic.
- **Verification.** Upon launch, incoming calls **will be verified** on ingress SBCs; calls failing signature or certificate checks **will be blocked** or downgraded.
- **Lab Certificates.** Until launch, Sent signs test calls with certificates issued under the STI-GA’s “**Sandbox**” root. Production PASSporTs will be re-issued from the public trust chain before T-0.
- **Key Management.** Production keys **will be rotated** at least every 90 days; staging keys already follow this cycle. Compromised keys will trigger immediate revocation with the STI-PA.

3.2 Attestation Logic

Attestation	Criteria	Application at Sent
A – Full	Sent has a direct customer relationship and has validated that the caller is authorized to use the telephone number.	Default for all traffic that passes KYC & number-ownership checks.
B – Partial	Customer is known, but number use cannot be fully validated.	Used only for BYO-PBX customers with pooled outbound CLIs.
C – Gateway	Sent cannot identify the customer; only knows the gateway.	Not used; Sent will block such traffic at ingress.

4. Know-Your-Customer (KYC) & On-Boarding Controls

Sent is **collecting KYC documentation in advance** but **will not assign Attestation A nor activate outbound trunks** for any customer until the customer clears all checkpoints **within 14 days of Launch**. Sent applies a multi-layered KYC program modeled on recent FCC guidance.

Step	Required Evidence	Automated / Manual?
Identity verification	U.S. entity: EIN + IRS SS-4; Non-U.S.: certificate of incorporation & passport/ID of controlling persons.	Manual + ID-verification API
Business legitimacy	Active Secretary-of-State certificate, website review, adverse-media screen.	Automated watch-list scan
Number ownership	LOA, RespOrg record, or NPAC CSR validating right to use each TN.	Manual review
Traffic intent survey	Use-case, target geographies, opt-in process, sample call scripts.	Manual
Fraud & sanctions screen	OFAC, BIS, FinCEN, and FCC enforcement databases.	Automated
K-level risk score	Internal numeric score (0-100). Must be ≤ 30 for Attestation A.	Automated
Contractual undertakings	FCC compliance clause; prohibition on AI-generated voice without consent; immediate suspension clause.	Manual; services remain disabled until contract is counter-signed prior to Launch.

Customers failing any checkpoint are rejected or assigned only Attestation B with heightened monitoring.

5. Real-Time & Post-Call Traffic Analytics

Upon Launch, Sent will:

- **Conduct Call-by-Call Signing Audits.** A random sample ($\geq 1\%$ of daily volume) will be looped back for internal verification to confirm correct identity header insertion.
- **Utilize Anomaly Detection.** Machine-learning models will flag spikes in short-duration calls (<6 s), invalid numbering, or sudden increases in call failure codes.
- **Subscribe to Third-Party Reputation Feeds.** Sent will subscribe to ANI reputation services (e.g., First Orion, Hiya) to correlate complaints.

- **Implement 90-Day Data Retention.** CDRs, SIP headers, and Identity tokens **will be stored** for 90 days to aid traceback.

Prior to Launch, all detection thresholds are exercised with synthetic traffic against our staging dashboards.

6. Traceback & Enforcement Procedures

Requirement	Sent Control
24-hour response to traceback requests (FCC, law enforcement, ITG).	Dedicated on-call engineer and shared mailbox (traceback@sent.dm) monitored 24 x 7.
Immediate blocking of traffic once Sent is notified of illegal calls.	An ACL rule will be pushed within 15 minutes via automated orchestration.
Customer investigation within 48 hours; suspension/termination within 72 hours if violation confirmed.	Policy codified in MSA Section 7.

7. Upstream & Downstream Due Diligence

- **Know Your Upstream Provider.** Sent **will only accept** traffic from carriers listed in the FCC Robocall Mitigation Database with an active certification.
- **Termination Partners.** All outbound partners **will be required** to validate and honor Identity headers; contracts require them to block unsigned or invalidly signed traffic.

8. Employee Training & Governance

- Mandatory **annual training** for all engineering, support, and sales staff on robocall rules, KYC red flags, and STIR/SHAKEN procedures.
- A **Compliance Committee** (CEO, CTO, GC, Director of Carrier Relations) **will meet** quarterly to review metrics and enforcement actions.

9. Recordkeeping & Audit

Record	Retention	Storage
KYC files & LOAs	5 years after account closure	Encrypted document vault
Signed Identity tokens	90 days	Object storage (WORM)
Traceback correspondence	2 years	Ticketing system

An **annual third-party audit** (SOC 2 Type II with robocall-specific controls) will be conducted to attest to policy adherence, with the first audit scheduled post-launch.

10. Continuous Improvement

Sent reviews FCC rulemakings and industry best practices at least annually. Upcoming priorities upon launch will include:

- Adoption of **Out-of-Band SHAKEN** for any future non-IP peering paths.
- Integration of the **Do-Not-Originate (DNO) list** from USTelecom ITG.
- Automated AI-voice detection to comply with the FCC’s rules on unsolicited AI-generated voice calls.

11. Implementation Timeline (Pre-Production to Day-90)

Phase	Milestone	Target Date	“Proof” the FCC can inspect
Build-Complete	Staging SBCs sign & verify A-level tokens for lab calls	Done (Q2 2025)	Internal SIP logs, STI-CA cert IDs
Cut-Over Freeze	Production keys in HSM; CA certificate pinned to FRN + OCN	T – 30 days	CA approval email
Launch (“T-0”)	First external traffic (<50 CPS pilot)	Q4 2025	Pilot CDR sample
Post-Launch Audit	External SOC 2 w/ robocall controls	T + 90 days	Audit letter

12. RMD Lifecycle for New Entrants

- **Initial filing (this document) = “Facilities Ready, Traffic 0.”**
- **Amendment #1** will be filed **within 10 days of Launch** to change status to “Active Traffic – Option 1.”
- **Annual recertification** will be completed as required by the FCC.

13. Declaration

I, **Daniel Vataj**, President of Sent, Inc., certify under penalty of perjury that the foregoing Robocall Mitigation Program is true and correct and that Sent, Inc. will

- (a) fully cooperate with traceback requests within 24 hours,
- (b) maintain the KYC and mitigation measures described herein, and
- (c) continuously monitor and improve our controls to prevent the origination of illegal robocalls.

Daniel Vataj

Daniel Vataj
Sent, Inc.

Executed July 24, 2025 – Dover, DE

Audit trail

Details	
FILE NAME	Sent, Inc. RMD Policy 07/26/25
STATUS	Signed
STATUS TIMESTAMP	2025/07/26 18:45:38 UTC

Activity		
SENT	d@sent.dm sent a signature request to: Daniel Vataj (d@sent.dm)	2025/07/26 18:44:56 UTC
SIGNED	Signed by Daniel Vataj (d@sent.dm)	2025/07/26 18:45:38 UTC
COMPLETED	This document has been signed by all signers and is complete	2025/07/26 18:45:38 UTC

The email address indicated above for each signer may be associated with a Google account, and may either be the primary email address or secondary email address associated with that account.