

Robocall Mitigation Program Description

Seed Voice has implemented a comprehensive Robocall Mitigation Program designed to prevent the origination of illegal robocall traffic, support industry traceback efforts, and comply with all applicable FCC regulations under 47 CFR § 64.6305(a).

1. Know Your Customer (KYC) Policies

Seed Voice enforces a strict Know Your Customer (KYC) process for all new and existing customers:

- **Business verification** is conducted for all accounts, including validation of entity registration (EIN and Secretary of State lookup), contact information, and service intent.
- Customers are required to agree to Terms of Service that explicitly prohibit the use of services for unlawful robocalling or spoofing.
- Service activations may be delayed or denied based on risk factors identified during onboarding.

2. Traffic Monitoring and Mitigation

Seed Voice actively monitors voice traffic originating from its network to identify and prevent illegal robocall behavior:

- **Automated analysis tools** review call detail records (CDRs) for anomalous calling patterns including:
 - High calls-per-second (CPS)
 - Short-duration calls in bulk
 - Repetitive call targets
 - Unassigned or invalid caller IDs
- Suspicious activity triggers internal reviews and may result in traffic being **blocked, rate-limited, or suspended** pending investigation.
- Real-time alerts allow for proactive mitigation of problematic traffic, with escalations to compliance personnel as needed.

3. Call Authentication and Caller ID Integrity

While caller ID signing is handled in accordance with STIR/SHAKEN where applicable, Seed Voice maintains safeguards to ensure only authorized numbers are used for outbound caller ID:

- All caller ID values are validated against the customer's provisioned DID.

- Unauthorized or spoofed outbound numbers are automatically blocked or flagged.
- Customers are prohibited from modifying caller ID values outside of their assigned number inventory.

4. Traceback Cooperation

Seed Voice fully supports and cooperates with the FCC, law enforcement, and the Industry Traceback Group (ITG) in efforts to identify and shut down illegal robocall operations:

- A designated compliance contact is available to respond to traceback requests within **24 hours**.
- Call trace data, logs, and customer contact records are preserved and shared as needed to assist investigations.
- Verified misuse results in swift enforcement action, up to and including **termination of service**.

5. Ongoing Review and Compliance

- The Robocall Mitigation Program is reviewed **at least quarterly** and updated to reflect changes in regulatory requirements and industry best practices.
- Staff receive training on identifying abusive traffic, enforcing mitigation procedures, and handling traceback requests.

Documentation of mitigation activities and traceback responses is maintained for audit purposes.

6. Communications and Questions

All Program Questions, Changes and Requests should be directed to:

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