

EXHIBIT TO CERTIFICATION OF SINCH FOR ROBOCALL MITIGATION DATABASE

As part of Sinch's¹ submission to the Robocall Mitigation Database, pursuant to the FCC's *Sixth Caller ID Authentication Report and Order*, and applicable predecessor orders, this document describes (1) the specific reasonable steps Sinch takes to avoid carrying or processing illegal robocall traffic; (2) Sinch's commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium; and (3) Sinch's commitment to cooperate with such entities in investigating and stopping any illegal robocallers that use the provider's service to carry or process calls.² Sinch previously provided its certification document for admission into the Robocall Mitigation Database on the basis of its status as a voice service provider, updated its documentation as required by the FCC in the *Gateway Provider Order*, and submits this further updated document pursuant to the *Sixth Caller ID Authentication Report and Order*.

Information regarding Sinch's voice service affiliates is set forth in Attachment A.

I. ENTITIES COVERED BY CERTIFICATION

The following entities are all subject to the robocall mitigation policies and procedures described in this document:

- ANPI Business, LLC
- ANPI, LLC
- Inteliquent, Inc.
- Minnesota Independent Equal Access Corporation (MIEAC)

¹ As described more fully in Section I, for the purposes of this submission, "Inteliquent" refers to a number of related entities.

² See *Call Authentication Trust Anchor*, WC Docket No. 17-97, Sixth Report and Order and Further Notice of Proposed Rulemaking, FCC 23-18 (Mar. 17, 2023). See also *Wireline Competition Bureau Announces Robocall Mitigation Database Filing Deadlines and Instructions and Additional Compliance Dates*, Public Notice, WC Docket No. 17-97 (Jan. 25, 2024). .

- Onvoy, LLC
- Onvoy Spectrum LLC
- RadiantIQ, LLC
- Sinch America Inc.
- Voyant Communications, LLC
- Voyant Solutions, LLC

Onvoy, LLC is the direct or indirect parent of each of the other entities listed above, and all of these entities are subject to the same robocall mitigation plan.³ The ultimate parent of Onvoy LLC is Sinch AB (publ), a publicly traded company. For the purposes of this document, these entities are collectively referred to as “Sinch.”

II. DESCRIPTION OF ROBOCALL MITIGATION PROGRAM

A. Efforts to Avoid Carrying or Processing Illegal Robocalls

Sinch has made meaningful investments to implement network upgrades and offer new features in order to combat carrying or processing illegal robocalls. All calls originated on, or that traverse, the network are subject to a robocall mitigation program with detailed practices reasonably expected to significantly reduce the origination, processing or carrying of illegal robocalls. Sinch deploys multiple systems to detect potential robocall activity based on statistics such as average call duration, Answer Seize Ratio (“ASR”) and call count carrier/consumer reports. Sinch also provides the following solutions on the Sinch network to help minimize the impact of illegal or unwanted robocalls on customers:

³ Previous versions of Sinch’s plan included Onvoy, LTD and Onvoy Communications Limited. Onvoy, LTD and Onvoy Communications Limited have since been dissolved and accordingly are no longer covered by this plan.

- **Know Your Customer/Know Your Upstream Provider:** Sinch has a “Know Your Customer Team” comprised of multiple employees. This team conducts “know your customer” and “know your upstream provider” vetting before it allows a party to become a new customer. Among other tests, the team will investigate the type of service being sought by the prospective customer and review the potential customer’s website to ensure that it has functional links and is not using fictitious names. Sinch’s KYC department also will determine whether potential customers have a concerning number of prior ITG trace-back requests and may also reach out directly to US Telecom and other contacts throughout the industry to ask whether the prospective customer is problematic. Sinch’s KYC will research whether the prospective customer is located overseas (which would require meeting of Know Your Upstream Provider and International Gateway Policy requirements), and whether the FCC or the FTC have sent the prospective customer of individuals associated with the customer letters identifying them as involved in robocalling or spoofing. Additionally, Sinch’s KYC team will ensure that a prospective customer is registered in the FCC’s robocall mitigation database (and does not withdraw such registration) if the customer is classified by the FCC as a “provider.” Any information that is provided to Sinch is compared to public information available either on the customer’s website or through other internet-based resources.
- **Network Tools:** Sinch uses the following network tools to combat illegal robocalls:
 - **Randomizer:** Utilized for customer traffic which is sent to Sinch via a Least Cost Routing (“LCR”) engine. Based on calling party telephone number analytics, an announcement is played to the calling party that requires the calling party to enter two randomly generated digits to complete the call. If the correct digits are not entered, the call will not proceed (machine generated calls presumably are unable to enter the randomly generated digits).
 - **Proactive Blocking:** Applied to all traffic. Per rules adopted by the Commission, Sinch blocks calls from phone numbers on Do-Not-Originate (“DNO”) lists from US Telecom, SOMOS and Neustar. In certain circumstances, Sinch also blocks calls that originate from invalid, unallocated, or unused numbers. Sinch’s customers may also place certain of the inbound-only telephone numbers they use on the DNO list.
 - **No Treatment:** This treatment is applied to lawful robocalls so that they can complete. Call types eligible for this treatment include debt collections, political calls, surveys, non-profit, emergency notifications, and other lawful call types.
 - **Whitelist:** Sinch “whitelists” telephone numbers that it knows originate legitimate calls (i.e., are valid). For example, some law enforcement and emergency calls originate from numbers where the entire telephone number is composed of zeroes. While appearing to be an unallocated number, Sinch knows based on call history that the call is originating from a federal law enforcement agency or a local police department. Such calls also originate from older or misconfigured PBXs (private

branch exchanges). Another example would be collection calls by Bank of America or calls to known numbers used for emergency county-wide or municipal alerts.

- **Teaming with Others:** Sinch works with other companies to stop unlawful robocalls. For example, Sinch has worked with “YouMail.” From services that YouMail provides to its own customers, YouMail creates a near real-time feed of telephone numbers being used unlawfully (typically associated with the “IRS” or similar scams). Sinch then monitors these numbers to take potential action. If Sinch recognizes that calls are being carried on its network that are originating from these numbers, then DNO treatment (as described above) will be applied.
- **Contract Termination:** Sinch typically has contractual rights that allow it to terminate customers that violate relevant law, including violations of the Telephone Consumer Protection Act. When appropriate, Sinch enforces these rights. Subject to applicable laws that may prevent it from doing so, Sinch may also terminate accounts if it discovers that any of the entities or individuals associated with a customer account have been named by the FCC or the FTC as an illegal robocaller or have failed to respond to traceback requests.

As a gateway provider, Sinch does not have a direct relationship with a party that may be originating unlawful robocalls. Accordingly, when Sinch suspects it has identified unlawful calling, in addition to taking the steps identified above, it may also contact the party sending Sinch the calls (i.e., Sinch’s carrier/provider customer), and request that they work to investigate their customers (e.g., to identify the party sending them the calls, determine whether the calls are unlawful, and then to eliminate the source of the calling). At the same time, Sinch is aware of the need to balance any blocking and termination efforts with the goal of preventing the blocking of legitimate calls, particularly those that have a bearing on public safety or health (e.g., a school system sending an alert or law enforcement).

B. Traceback Requests

Sinch is a founding member of the Industry Traceback Group (“ITG”) sponsored by USTelecom. The ITG is a collaborative effort of companies across the wireline, wireless, VoIP and cable industries that actively trace and identify the source of illegal robocalls. Moreover,

Sinch also served on the Robocall Strike Force established by the Federal Communications Commission (“FCC”) in 2016 at the request of the FCC’s then-chairman, Tom Wheeler. The Robocall Strike Force was created to accelerate the development and adoption of new tools and solutions to abate the proliferation of illegal and unwanted robocalls, to promote greater consumer control over the calls they wish to receive, and to make recommendations to the FCC on the role government can play to stop unlawful robocalls. Sinch commits to continue to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.

C. Commitment to Cooperate in Investigating and Stopping Illegal Robocallers

Sinch also promptly responds to inquiries from law enforcement and regulators, including the FCC, Federal Trade Commission (“FTC”) or state attorneys general seeking traceback or similar information. Sinch commits to continue to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use Sinch’s services to carry or process calls.

D. STIR/SHAKEN Compliance

Sinch has implemented STIR/SHAKEN to all egress traffic. In fact, Sinch is a leading industry proponent regarding the implementation of STIR/SHAKEN, including as a member of the board and certain committees of The Alliance for *Telecommunications* Industry Solutions (“ATIS”). Via ATIS, Sinch has provided input into the development of the industry guidelines for STIR/SHAKEN implementation. On May 29, 2020, Sinch submitted comments to the FCC in the FCC’s Further Notice of Proposed Rulemaking in the docket entitled *Implementation of TRACED Act, Section 6(a) — Knowledge of Customers by Entities with Access to Numbering Resources*.⁴

⁴ Inteligent Comments, WC Docket Nos. 17-97 and 20-67, at 1 (rec. May 29, 2020).

In its comments, Sinch supported the FCC’s efforts and made important suggestions to empower all providers in the call path with tools and solutions for end-to-end call authentication. In particular, Sinch recommended that the FCC (1) pursue out-of-band STIR/SHAKEN as a “reasonable measure” to address call authentication when calls are not all-IP and (2) promote the benefits of innovative solutions such as delegated certificates and pushing certificate signing authority closer to the source, which will enable a broader variety of voice providers to help authenticate calls.

Although its role as a gateway and an intermediate provider is somewhat unique, Sinch was a leader in implementing network features to allow the transit of header information. By so doing, it has allowed for the end-to-end implementation of STIR/SHAKEN for providers that have these capabilities. Indeed, Sinch, Comcast, and T-Mobile worked together to deliver the first end-to-end STIR/SHAKEN call across three networks.⁵

Finally, Sinch is also actively engaged in providing information to its customers to help them become STIR/SHAKEN compliant (for example, through webinars).

E. Third-Party Vendors for Call Analytics

Sinch uses the network tools described above to analyze the traffic it carries. Moreover, Sinch uses Neustar and First Orion as third-party vendors to perform additional call analytics.

F. Operating Company Numbers

- ANPI Business LLC: 712J
- ANPI, LLC: No
- Inteliquent, Inc.: 559F, 542C
- Minnesota Independent Equal Access Corporation (MIEAC): 8811

⁵ Press Release, T-Mobile, T-Mobile, Comcast and Inteliquent Deliver Industry First in War Against Illegal Call Spoofing (Nov. 21, 2019), <https://www.t-mobile.com/news/tmobile-comcast-inteliquent>.

- Onvoy, LLC: 638C, 363F, 588J, 346K, 645J, 741E, 224C, 630H, 604E, 951H, 348F, 065H, 630E, 668G, 649C, 273F, 026D 712H, 639C, 247H, 850D, 467H, 969E, 301H, 937C, 302H, 067D, 385J, 210H, 742E, 221F, 689F, 304H, 539H, 505B, 097D, 511H, 205F, 755H, 896E, 565H, 749E, 355H, 892D, 353H, 876D, 515H, 454F, 4899, 184D, 389H, 093F, 344J, 719E, 715G, 453F, 267H, 638E, 263F, 452F, 872G, 549E, 566H, 637E, 330H, 637C, 899G, 206F, 759G, 029F, 215F, 464C, 390H, 409F, 747G, 750E, 303H, 547E, 488H, 977E, 664H, 548E, 858G, 162G, 357J, 525E, 914G, 903C, 711G, 871E, 567H, 138E, 854H, 451F, 712G, 483E, 940E, 225C, 713H, 449F, 944G, 450F, 877G, 384C, 214F, 543C, 825F, 787F, 788F, 425G, 916D, 426G, 789F, 790F, 424G, 276D, 791F, 277D, 792F, 793F, 797F, 794F, 278D, 795F, 796F, 910D, 798F, 799F, 427G, 131D, 801F, 800F, 912D, 802F, 918D, 803F, 804F, 428G, 805F, 779F, 812F, 813F, 806F, 808F, 809F, 142D, 810F, 807F, 008D, 811F, 128D, 957G, 814F, 815F, 129D, 816F, 817F, 818F, 819F, 429G, 279D, 820F, 430G, 431G, 821F, 822F, 824F, 823F, 432G, 345H
- Onvoy Spectrum LLC: 624H
- RadiantIQ, LLC: 566J
- Sinch America Inc.: No
- Voyant Communications LLC: 573J
- Voyant Solutions, LLC: No

G. Information Regarding Principals and Related Entities

Attachment A of this document provides information regarding principals, affiliates, subsidiaries, and parent companies within the Sinch group of companies that provide voice services. For each such entity, Sinch provides the entity's place of incorporation, director(s), officer(s), and information on its ownership. While the Commission has not specified the precise information to be provided on principals, affiliates, subsidiaries, and parent companies, Sinch submits that the information provided in Attachment A is more than sufficient to make clear that none of the Sinch entities or their principals, affiliates, subsidiaries, or parent companies have been prohibited from filing in the Robocall Mitigation Database.

Attachment A

**Information Regarding Sinch Principals and
Related Entities Providing Voice Services**

Corporate Information

ANPI Business, LLC

State of Organization: Delaware

Directors:

Julia Fraser
Brian West
Robert Gerstmann

Officers:

Julia Fraser:	Chief Executive Officer and EVP, Americas
Brian West:	Chief Financial Officer
Robert Gerstmann	Secretary
Richard Monto:	General Counsel
Brett Scorza	Chief Technology Officer
Imad Al Ajarmeh:	Chief Network Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Sr. Compliance and Policy Director

Ownership: ANPI Business, LLC is 100% owned by ANZ Communications, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Corporate Information

ANPI, LLC

State of Organization: Delaware

Directors:

Julia Fraser
Brian West
Robert Gerstmann

Officers:

Julia Fraser:	Chief Executive Officer and EVP, Americas
Brian West:	Chief Financial Officer
Robert Gerstmann	Secretary
Richard Monto:	General Counsel
Brett Scorza	Chief Technology Officer
Imad Al Ajarmeh:	Chief Network Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Deb Sharrow:	Chief Accounting Officer
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Sr. Compliance and Policy Director

Ownership: ANPI, LLC is 100% owned by ANZ Communications, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Corporate Information

Inteliquent, Inc.

State of Organization: Delaware

Directors:

Julia Fraser
Brian West
Robert Gerstmann

Officers:

Julia Fraser:	Chief Executive Officer and EVP, Americas
Brian West:	Chief Financial Officer
Robert Gerstmann	Secretary
Richard Monto:	General Counsel
Brett Scorza	Chief Technology Officer
Imad Al Ajarmeh:	Chief Network Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Sr. Compliance and Policy Director

Ownership: Inteliquent, Inc. is 100% owned by Onvoy, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Corporate Information

Minnesota Independent Equal Access Corporation

State of Organization: Minnesota

Directors:

Julia Fraser
Brian West
Robert Gerstmann

Officers:

Julia Fraser:	Chief Executive Officer and EVP, Americas
Brian West:	Chief Financial Officer
Robert Gerstmann	Secretary
Richard Monto:	General Counsel
Brett Scorza	Chief Technology Officer
Imad Al Ajarmeh:	Chief Network Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Sr. Compliance and Policy Director

Ownership: Minnesota Independent Equal Access Corporation is 100% owned by Onvoy, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Services Provided: Minnesota Independent Equal Access Corporation only provides Tandem Access Services.

Corporate Information

Onvoy, LLC

State of Organization: Minnesota

Directors:

Julia Fraser
Brian West
Robert Gerstmann

Officers:

Julia Fraser:	Chief Executive Officer and EVP, Americas
Brian West:	Chief Financial Officer
Robert Gerstmann	Secretary
Richard Monto:	General Counsel
Brett Scorza	Chief Technology Officer
Imad Al Ajarmeh:	Chief Network Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Sr. Compliance and Policy Director

Ownership: Onvoy, LLC is 100% owned by Onvoy Intermediate Holdings, Inc. Ultimately, this entity is owned by Sinch AB (publ).

Corporate Information

Onvoy Spectrum, LLC

State of Organization: Delaware

Directors:

Julia Fraser
Brian West
Robert Gerstmann

Officers:

Julia Fraser:	Chief Executive Officer and EVP, Americas
Brian West:	Chief Financial Officer
Robert Gerstmann	Secretary
Richard Monto:	General Counsel
Brett Scorza	Chief Technology Officer
Imad Al Ajarmeh:	Chief Network Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Sr. Compliance and Policy Director

Ownership: Onvoy Spectrum, LLC is 100% owned by Onvoy, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Corporate Information

RadiantIQ LLC

State of Organization: Delaware

Directors:

Julia Fraser
Brian West
Robert Gerstmann

Officers:

Julia Fraser:	Chief Executive Officer and EVP, Americas
Brian West:	Chief Financial Officer
Robert Gerstmann	Secretary
Richard Monto:	General Counsel
Brett Scorza	Chief Technology Officer
Imad Al Ajarmeh:	Chief Network Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Sr. Compliance and Policy Director

Ownership: RadiantIQ LLC is 100% owned by Onvoy, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Corporate Information

Sinch America Inc.

State of Organization: Delaware

Directors:

Julia Fraser
Brian West
Robert Gerstmann

Officers:

Julia Fraser:	President
Brian West:	Chief Financial Officer and Treasurer
Robert Gerstmann:	Secretary

Ownership: Sinch America Inc. is 100% owned by Sinch US Holding Inc. Its ultimate owner is Sinch AB (publ).

Sinch AB's Directors:

Erik Fröberg
Björn Zethraeus
Lena Almefelt
Mattias Stenberg
Renée Robinson Strömberg
Bridget Cosgrave
Hudson Smith

Sinch AB's Officers:

Jonas Dahlberg:	Interim Chief Executive Officer and Chief Financial Officer
Brett Scorza:	Chief Technology Officer
Lindy Puttkammer:	Chief Human Resources Officer
Ilse van der Haar:	Chief Legal Officer
Sophie Cheng:	Chief Marketing Officer
Julia Fraser:	Executive Vice President Americas
Jonathan Bean:	Executive Vice President, EMEA
Daniel Morris:	Chief Product Officer
Wendy Johnstone:	Executive Vice President, APAC

Corporate Information

Sinch UK Ltd.

Country of Organization: England

Company Registration Number: 3049312

Directors:

Jan-Erik Svensson

Nicklas Molin

Officers: Not applicable (entity is director managed)

Ownership: Sinch UK Ltd. is 100% owned by Sinch Holding AB, which in turn is 100% owned by Sinch AB (publ).

Markets Served: Sinch UK Ltd. provides voice services in certain non-U.S. locations.

Sinch UK Ltd. does not provide services in the United States.

Sinch AB's Directors:

Erik Fröberg

Björn Zethraeus

Lena Almefelt

Mattias Stenberg

Renée Robinson Strömberg

Bridget Cosgrave

Hudson Smith

Sinch AB's Officers:

Jonas Dahlberg:

Interim Chief Executive Officer and Chief Financial Officer

Brett Scorza:

Chief Technology Officer

Lindy Puttkammer:

Chief Human Resources Officer

Ilse van der Haar:

Chief Legal Officer

Sophie Cheng:

Chief Marketing Officer

Julia Fraser:

Executive Vice President Americas

Jonathan Bean:

Executive Vice President, EMEA

Daniel Morris:

Chief Product Officer

Wendy Johnstone:

Executive Vice President, APAC

Corporate Information

Voyant Communications, LLC

State of Organization: Delaware

Directors:

Julia Fraser
Brian West
Robert Gerstmann

Officers:

Julia Fraser:	Chief Executive Officer and EVP, Americas
Brian West:	Chief Financial Officer
Robert Gerstmann	Secretary
Richard Monto:	General Counsel
Brett Scorza	Chief Technology Officer
Imad Al Ajarmeh:	Chief Network Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Sr. Compliance and Policy Director

Ownership: Voyant Communications, LLC is 100% owned by Onvoy, LLC. Ultimately, this entity is owned by Sinch AB (publ).

Corporate Information

Voyant Solutions, LLC

State of Organization: Delaware

Directors:

Johan Hedberg
Jesper Larson
Dave Pruse

Officers:

Dave Pruse:	President
Andrea Nyhus:	Chief Financial Officer
Johan Hedberg:	Secretary
Richard Monto:	General Counsel, Americas
Brett Scorza:	Chief Technology Officer
Imad Al Ajarmeh:	Chief Network Officer
Nick Reifschneider:	Vice President, Communications Service Providers
Dan Quandt:	Senior Vice President, Product
Randy Frederick:	VP, Network Services
Jon Clopton:	SVP, Network Cost Management
Heather Arrington:	VP, Customer Support
Jeff Carney:	Chief Technical Officer, Technology Organization
Hannah Wong:	Chief of Staff, Technology Organization
Stacy Graham:	Sr. Compliance and Policy Director

Ownership: Voyant Solutions, LLC is 100% owned by Voyant Holdings, LLC. Ultimately, this entity is owned by Sinch AB (publ).