

ROBOCALL MITIGATION PLAN (RMP)

Prepared for the Federal Communications Commission (FCC) Robocall Mitigation Database

1. Company Information

Company Name: Setera USA INC

FCC Registration Number (FRN): 0031141294

Company Address: Madison Avenue 295, Suite 2200, State NY, 10017 New York

Point of Contact (Name & Title): Richard Williams, President

Email: regulatory@setera.com

Phone: +1 442 200 6644

Agent for Service of Process: Setera USA INC, 295 Madison Avenue, Suite 2200, New York, NY 10017 (Attn: Tuomo Kiesvaara)

2. STIR/SHAKEN Implementation Status

Pursuant to 47 CFR § 64.6305, Setera USA INC certifies the following status (Check one):

- ☒ **Full Implementation:** STIR/SHAKEN is fully deployed on all IP portions of the network.
- ☐ **Partial Implementation:** STIR/SHAKEN is active on IP portions; a Robocall Mitigation Plan is active for non-IP portions.
- ☐ **Implementation Extension:** Operating under an active FCC extension but maintaining this RMP.

Setera USA INC has implemented STIR/SHAKEN through a **Hosted Signing Agreement** with **DIDWW**. Setera maintains its own SPC token and utilizes DIDWW's infrastructure to cryptographically sign calls at the network edge, ensuring all IP-originated traffic carries valid caller identity attestation

3. Core Mitigation Strategies

Setera USA INC employs a multi-layered defense strategy to ensure illegal traffic does not originate from, or transit through, our network.

A. Advanced Know Your Customer (KYC) Protocols

We prevent illegal robocalling at the source by vetting all clients before providing service:

- **Identity Verification:** We require valid business registration, tax IDs, and physical address verification.
- **Traffic Profile Analysis:** New customers must provide their expected call volume, use case (e.g., telemarketing, alerts, customer service), and source of consent.
- **Vetting of Resellers:** We require downstream providers to certify they have their own RMP in place.

- **Upstream/Downstream Accountability:** We maintain records of the 'ultimate' source of traffic for all wholesale clients and require customers to identify any third-party dialers used in their campaigns.

B. Real-Time Network Monitoring

- **Anomalous Pattern Detection:** Our systems flag "short-duration" calls, high call-completion failure rates, and bursts of high-volume traffic from a single source.
- **Automatic Thresholds:** Accounts exceeding a specific "calls-per-second" (CPS) threshold without prior authorization are automatically throttled or suspended.

C. Caller ID Integrity

- **3rd party number usage:** We only allow traffic from our own numbers.
- **Attestation Levels:** We strictly apply **A, B, or C** attestations based on our confidence in the caller's identity and their right to use the telephone number.

4. Traceback Cooperation & Enforcement

Setera USA INC recognizes that rapid response is the key to stopping active campaigns.

- **24-Hour Response:** We commit to responding to all **Industry Traceback Group (ITG)** requests within 24 hours.
- **Upstream Investigation:** If illegal traffic is identified, we trace it to the point of origin and take immediate action.
- **Zero Tolerance Policy:** Any customer found to be intentionally originating illegal robocalls will have their services terminated immediately without a refund.

5. Continuous Improvement

Our compliance officer reviews our mitigation effectiveness quarterly. This includes:

1. Refining monitoring algorithms to catch evolving "scam" tactics.
2. Ensuring all software patches for STIR/SHAKEN controllers are current.

6. Certification and Attestation

I, Richard Williams, certify that I am an officer of Setera USA INC and that I have personal knowledge of the facts contained in this Robocall Mitigation Plan. I certify that Setera USA INC is a domestic voice service provider in the United States, has implemented the STIR/SHAKEN authentication framework as described herein and is in full compliance with 47 CFR § 64.6305. I acknowledge that any false or inaccurate statement

in this plan may result in a forfeiture of at least \$10,000 per violation and/or removal from the Robocall Mitigation Database.

Signature:

A handwritten signature in purple ink that reads "Richard Williams". The signature is written in a cursive style with a large, stylized "R" and "W".

Date: 26 February 2026

Richard Williams, President Setera USA Inc.