



Sellery CRM LLC

Robocall Mitigation Program Description

1. Filer Information

Legal Name	Sellery CRM LLC
State of Formation	Florida
FRN	0038328985
FCC Form 499 Filer ID	838859
Business Address	220 Hillsboro Technology Drive, Suite 240, Deerfield Beach, FL 33441
Compliance Contact	Hunter Wolf, Operations
Email	compliance@sellerycrm.com
Phone	(561) 213-4525
Website	https://www.sellerycrm.com

2. Service Description

Sellery CRM LLC ("Sellery") operates a multi-tenant customer relationship management platform that includes integrated voice and short-message communications. Sellery does not own or operate TDM switching, local exchange, or interexchange facilities. All voice traffic is originated on an IP softphone within Sellery's web application and delivered to the PSTN through one or more upstream wholesale voice carrier partners under commercial interconnection agreements. Sellery's subscribers are authenticated business users who place outbound calls to their own prospects and customers in the ordinary course of business.

3. Voice Service Provider Role

For purposes of 47 CFR § 64.6300 et seq., Sellery is a voice service provider with a STIR/SHAKEN implementation obligation serving end-users. Sellery is *not* a gateway provider, does not handle foreign-originated traffic, and does not act as a wholesale provider to other carriers.

4. STIR/SHAKEN Compliance

All calls originated by Sellery end-users are authenticated under the STIR/SHAKEN framework and are compliant with 47 CFR § 64.6301. Signing is performed by Sellery's upstream wholesale voice carrier(s) pursuant to their STI-CA-issued credentials, as is standard practice for application-layer voice service providers that originate traffic through commercial wholesale interconnections.

Sellery has structured its operations to ensure full compliance across its entire network: one hundred percent of originated calls traverse a signing-enabled path and no call is permitted to egress without authentication.

Because Sellery performs Know-Your-Customer vetting on every subscribing organization and every end-user, and because each caller-ID number presented on an outbound call is assigned to the corresponding customer within the upstream carrier's number inventory, Sellery's traffic is eligible for Full ("A") attestation under the upstream carrier's signing policy. Sellery's commercial agreements with its upstream carriers require continuous STIR/SHAKEN signing of all originated traffic as a condition of service.

5. Robocall Mitigation Program

Sellery maintains a robocall mitigation program consistent with 47 CFR § 64.6305(a), comprising the following controls:

5.1 Customer Vetting (Know Your Customer)

- Every organization using Sellery's voice services completes a business-verification onboarding process before voice features are enabled. Verification includes business name, industry, intended use case, principal contact, and acceptance of Sellery's Terms of Service.
- Every end-user authenticates with unique credentials bound to their individual identity within the customer organization. Shared or pooled accounts are prohibited.
- Sellery's Terms of Service (<https://www.sellerycrm.com/terms>) require each customer to represent that they have obtained the level of consent required by the Telephone Consumer Protection Act, the Telemarketing Sales Rule, state mini-TCPA statutes, and applicable Do-Not-Call registries before placing any call, and to maintain records of that consent.

5.2 Caller Identification Controls

- End-users may present only caller-ID numbers that have been assigned to their organization within Sellery, provisioned through Sellery's upstream carrier. Arbitrary caller-ID entry is not permitted.
- Number-use verification is a prerequisite for Full ("A") attestation by the upstream signing carrier.
- Misrepresentation of calling-party identity in violation of the Truth in Caller ID Act is expressly prohibited by Sellery's Terms of Service and results in immediate account suspension.

5.3 Do-Not-Call and Opt-Out Compliance

- Sellery's platform supports per-organization suppression lists. Any number marked "Do Not Contact" is excluded from dialing and messaging across the organization's workflows.
- Customers are contractually obligated to scrub against the federal Do-Not-Call registry and applicable state DNC registries prior to outbound calling, in accordance with 47 CFR § 64.1200.
- Inbound opt-out and STOP requests are honored immediately and added to the organization's suppression list.

5.4 Content Restrictions

- Sellery's Terms of Service prohibit the use of the platform for calls or messages containing Sex, Hate, Alcohol, Firearms, or Tobacco ("SHAFT") content except where expressly permitted by the receiving carrier and limited to properly age-gated audiences; cannabis, CBD, kratom, or other controlled or carrier-restricted substances; high-risk financial offers including payday loans, debt relief, and cryptocurrency solicitations; phishing, fraud, deceptive claims, or impersonation; and malware or links to malware.
- Violations trigger immediate suspension and reporting to the receiving carrier and, where warranted, law enforcement.

5.5 Monitoring and Anomaly Detection

- Sellery continuously monitors aggregate call and message metrics at the organization and end-user level. Elevated opt-out rates, short-duration call ratios, spam-complaint rates, and pattern matches to known illegal-calling signatures trigger manual review or automated throttling.
- Repeated or unresolved anomalies result in suspension or termination of Communications Services.

6. Traceback Response

Sellery is committed to responding fully and within twenty-four (24) hours to any traceback request originated by the Federal Communications Commission, law enforcement, or the Industry Traceback Group managed by USTelecom. Traceback inquiries should be directed to:

Contact	Hunter Wolf, Operations
Email	compliance@sellerycrm.com
Phone	(561) 213-4525
Mailing Address	220 Hillsboro Technology Drive, Suite 240, Deerfield Beach, FL 33441

Sellery will identify the originating customer and end-user, produce Call Detail Records and, where available, call recordings, and cooperate in any downstream investigation. Where traceback findings indicate illegal calling, Sellery will suspend the offending account pending investigation and terminate the account where findings are confirmed.

7. Recordkeeping

Sellery retains Call Detail Records, SMS delivery logs, and, where enabled by the originating organization under applicable consent law, call recordings for a period sufficient to support traceback response and regulatory inquiry. Record retention practices are described in Sellery's Privacy Policy (<https://www.sellerycrm.com/privacy>).

8. Enforcement

Any violation of Sellery's Terms of Service, any carrier directive, or any federal, state, or local law governing calls or messages results in immediate account suspension pending investigation.

Confirmed violations result in termination of service and, where warranted, reporting to the Federal Communications Commission, the Federal Trade Commission, the appropriate state attorney general, and the originating customer's upstream terminating carrier.

9. Certifications

Sellery CRM LLC certifies that:

- All calls originated on its network are subject to the robocall mitigation program described above, consistent with 47 CFR § 64.6305(a);
- Sellery has not been prohibited from filing in the Robocall Mitigation Database by the Commission, and no prior certification has been removed by Commission action;
- Sellery will respond fully and within twenty-four (24) hours to all traceback requests from the Commission, law enforcement, and the Industry Traceback Group, and will cooperate in investigating and stopping any illegal robocallers that use its service to originate calls;
- The information provided in this Robocall Mitigation Program Description is true and correct to the best of the certifier's knowledge.

Respectfully submitted,

Hunter Wolf

Officer & Authorized Representative
Sellery CRM LLC