

Robocall Mitigation Program Description

Filer: Sevden LLC, dba Sevden Tech · FRN 0038793584 · 8465 W. Sahara Ave., Ste. 111 #1432, Las Vegas, NV 89117

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Filing type: Voice Service Provider · **Role in the call chain:** Voice Service Provider without a STIR/SHAKEN obligation · **Certification:** Option 3 — No STIR/SHAKEN Implementation (47 CFR § 64.6305(d)(1)(iii)) · **Date:** August 24, 2026

This description is submitted under 47 CFR § 64.6305(d)(2) and describes the specific reasonable steps Sevden LLC ("Sevden") takes to avoid originating illegal robocall traffic.

1. SERVICE PROFILE

Sevden is a non-facilities-based reseller of hosted business VoIP (unified communications) service delivered on the SkySwitch wholesale platform (BCM One). Sevden's customers are identified U.S. business subscribers under written contract, located in Nevada. Sevden originates no wholesale traffic, hosts no other carriers or providers, and offers no high-volume outbound dialing, autodialer, or calling-campaign product. Sevden is the only entity between its end-user customers and SkySwitch; Sevden has no upstream provider other than SkySwitch.

2. KNOW-YOUR-CUSTOMER PRACTICES (47 CFR § 64.1200(N)(4))

Every customer, before activation: (a) executes Sevden's Master Services Agreement and Acceptable Use Policy. The Acceptable Use Policy prohibits illegal robocalls, caller ID spoofing with intent to defraud or cause harm, artificially inflated traffic, and autodialed, prerecorded, or AI-generated voice calls placed without the consent required by law; (b) is verified as an operating business — business identity, address, and authorized contact are confirmed during onboarding before numbers are assigned; (c) receives service sized to ordinary business use: per-seat licensing with platform call limits configured per customer domain, not bulk origination capacity. Customers are contractually bound to cooperate with traceback and investigation requests. Renewing customers remain subject to the same contractual terms and to the monitoring in section 3.

3. TRAFFIC MONITORING AND CALL ANALYTICS

Sevden relies on the SkySwitch platform's network-level controls — including SkySwitch's real-time outbound monitoring, which flags invalid or unallocated calling numbers and withholds

attestation from calls with invalid calling numbers — and supplements them at the customer (tenant) level:

- call-limit configuration per customer domain on the platform;
- a monthly review by Sevden's Managing Member of per-customer outbound call volumes pulled from the platform's call detail records;
- investigation within one business day of any anomaly (volume spikes, unusual destinations, invalid or unassigned caller IDs), and immediate investigation of any abuse notice from SkySwitch, a carrier, the Industry Traceback Group, or a government agency.

Third-party analytics: the call analytics Sevden relies on are those operated by SkySwitch as the platform and originating carrier; Sevden uses no separate third-party call-analytics vendor.

4. TRACEBACK COOPERATION — 24-HOUR COMMITMENT

Sevden commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with those entities in investigating and stopping any illegal robocallers that use its service to originate calls, without requiring a subpoena. Customers are contractually bound to the same cooperation. Contact: dennis@sevden.com, 702-291-9598.

5. BLOCKING AND ENFORCEMENT

On receipt of a Commission Enforcement Bureau Notice of Suspected Illegal Traffic, Sevden will block the identified traffic as required by 47 CFR § 64.1200(n). Under its Acceptable Use Policy, Sevden may restrict, suspend, or terminate a customer immediately for suspected illegal traffic and will do so on its own initiative or on notice from SkySwitch, any carrier, or any agency. Sevden honors do-not-originate practices applied by its upstream platform.

6. UPSTREAM PROVIDER AND CALL AUTHENTICATION

Sevden's sole upstream provider is SkySwitch, which holds its own certification in the Robocall Mitigation Database. Before relying on SkySwitch and at least annually, Sevden confirms that SkySwitch's Database listing is current. Call authentication (STIR/SHAKEN signing) for all Sevden-originated traffic is performed by SkySwitch, the originating carrier of record on its own network, under SkySwitch's own STI certificate — attestation level A for telephone numbers purchased through SkySwitch, per SkySwitch's published STIR/SHAKEN compliance documentation. All Sevden customer numbers are SkySwitch numbers (purchased through SkySwitch or ported onto it). Sevden holds no STI certificate, SPC token, or Operating Company Number and controls no IP network of its own; this signing is SkySwitch's implementation of its own obligation, not Sevden's.

7. ACCURACY AND UPDATES

Sevden will update this filing within 10 business days of any material change and will recertify annually on or before March 1, as required by 47 CFR § 64.6305.

8. STATEMENT OF THE RULE THAT EXEMPTS SEVDEN FROM STIR/SHAKEN IMPLEMENTATION

Sevden does not own or control the network infrastructure necessary to implement STIR/SHAKEN: it operates no switching, session border controller, or carrier interconnection, and holds no Operating Company Number, SPC token, or STI certificate. The Commission's caller ID authentication rules "do not apply to providers that lack control of the network infrastructure necessary to implement STIR/SHAKEN" (First Caller ID Authentication Report and Order, 35 FCC Rcd 3241, 3260, ¶ 40; see Second Caller ID Authentication Report and Order, 36 FCC Rcd 1859, ¶¶ 19, 50). Where a wholesale provider originates calls onto the public network for a reseller that lacks such control, "it is the wholesale provider that has the STIR/SHAKEN implementation obligation, not the reseller" (Eighth Caller ID Authentication Report and Order, FCC 24-120, ¶ 17). SkySwitch originates all Sevden-originated calls and authenticates them under SkySwitch's own STI certificate. Sevden therefore has no STIR/SHAKEN implementation obligation under 47 CFR § 64.6301 and certifies under Option 3.

9. PRIOR ACTIONS

Sevden has not, at any time, been the subject of a Commission, law enforcement, or regulatory agency action or investigation concerning illegal robocalls, spoofing, or a deficient Robocall Mitigation Database filing, and has not been prohibited from filing in the Database.