

Meeting FTC Due Diligence Expectations

Requirements to Vet and Verify Enterprise Callers

FTC ORDER SETS EXPECTATIONS FOR DUE DILIGENCE

As the pioneer of Verified Identity in the communications ecosystem, Numeracle is enabling hundreds of legal entities to voluntarily disclose their calling identities via a 'know your customer' (KYC) process designed to validate call intent and consent-based competence in compliant calling. This process supports both the TRACED Act and the ongoing initiatives of the FTC to identify and block bad actor traffic.

In the landmark proceeding, *FTC, et. al. v. Educare Centre Services, Inc., et. al.*, a communications service provider found to be negligent in prohibiting the illegal calling practices of clients utilizing its network, is now banned from further engaging in communications delivery considered to be high risk.

Through this Order, the FTC has vocalized, again, its expectations for communications platform providers to implement stringent due diligence procedures related to customer onboarding and to adopt and implement monitoring procedures prior to delivering services to new accounts.

This is the process we have put into place to ensure your calling identity has been vetted and validated, and that you, **directly**, have authorized the use of your brand name in conjunction with the phone numbers identified for use.

LETTER OF AUTHORIZATION REQUIREMENTS

If called upon by the FTC or any of the wireless carriers to attest to the verified status of your calling identity and phone numbers, a Letter of Authorization, signed by you, must remain on file directly with Numeracle:

- This must be completed and signed directly by your brand
- No other document will be acceptable to fulfill the requirements of the TRACED Act

IMPROVED CALL DELIVERY

By meeting the necessary compliance and due diligence requirements, you are identifying yourself apart from bad actors to protect your calls from improper call blocking and labeling.