

LAW ENFORCEMENT AGENCY SUPPORT GUIDELINES for Legal Demands to Inteliquent (Operating Under the Sinch Voice Brand Name)

SUMMARY PAGE

OUR COMPANIES: Inteliquent, Inc. is now part of the Sinch Group. Inteliquent, Inc. and its affiliates operate under the brand name “**Sinch Voice**.” See list in [sec. 1.3](#) (can serve **Onvoy, LLC**).

LEGAL DEMAND REQUIRED: We must be served with a valid Legal Demand in order to release customer information (see [sec. 1.2](#) and [sec. 7](#)). Serve via email **only** per [sec. 4.1](#) (contrary submissions may be **rejected**).

Exception – Exigent Circumstances: use **only** dedicated web-form. See [sec. 8.6](#).

Exception – Law Portal: resource for registered users to query for wholesale customer identity. See [sec. 1.6](#).

Caution – MLAT Subpoenas: jurisdictions **other than** US and Canada must observe [sec. 10](#).

Caution – Voluminous: agencies seeking information on 25+ numbers must review [sec. 9](#).

CONTACTING INTELICQUENT / SINCH VOICE:

Please limit inquiries strictly to matters of necessity and only after **fully reviewing** our Guidelines, which address **most common questions**. Inquiries plainly answered in our Guidelines may receive no response. With over 100 million numbers on our network and a very small Legal Department, we make available our Law Portal and where a Legal Demand is necessary, our Guidelines inform about our company and how we process matters. Being unique in the industry, we must reasonably expect law enforcement will **review our Guidelines**. Operating nationally in the U.S. and also internationally, however, we are limited for time to discuss points clearly covered in our Guidelines.

Office Address, Phone Number and Standard Office Hours

For agencies unable to serve via email as directed by [sec. 4.1](#) or which must **also** serve via US Mail (see [sec. 8.4](#)), serve to the following address, or upon a registered agent of Company:

1 N. Wacker Drive, Suite 2500
Chicago, IL 60606

Legal Department contacts are available 8:00 am to 5:00 pm Central via email (above) or telephone at 872-275-2029.

For Email Service of New Legal Demands: LEArequests@sinch.com

Use of address acknowledges applicability of our Guidelines (address feeds into processing system [watch for our auto-reply]); **submissions contrary to sec. 4.1 (“Necessary Details”) are subject to delayed processing and rejection.**

We do **not consent** to service via facsimile or other email addresses (parties attempting contrary service assume all risk of inadvertent disclosure, delayed receipt/processing, non-receipt and non-processing). This address **only** accepts service of Legal Demands, as per [sec. 1.1](#) (civil litigants: see [sec. 1.5](#)). Do **not** use address for **any other purpose**, including status inquiries, Law Portal inquiries, to confirm/verify numbers, or to re-submit matters.

To Modify or Inquire re: Pending Legal Demands: LEAstatus@sinch.com

Use only: (1) to correct, supplement or withdraw a pending Legal Demand (e.g., missing due date or cover page) or (2) for response status inquiries. For status inquiries, **only** contact where response is past due (specify our case number in **subject line** – number is in our system’s auto-reply message to your submitted Legal Demand). See [sec. 8.3](#).

For Pre-Service Inquiries re: CDRs or Pen Register / Intercept: LEArecords@sinch.com

If, after fully reviewing [sec. 5](#) and/or [sec. 6](#), you believe our CDRs or pen register/intercept arrangements on our network are necessary, then email to this address to inquire **before issuing/serving** your Legal Demand.

For Law Enforcement Portal: LEAportal@sinch.com

Use to register as a user of our Law Portal (online resource to query for wholesale customer identity without need for Legal Demand), or request support as registered Portal user (see [sec. 1.6](#) and <https://www.sinch.com/legal/lea-portal/>).

LAW ENFORCEMENT AGENCY SUPPORT GUIDELINES for Legal Demands to Inteliquent (Operating Under the Sinch Voice Brand Name)

1. APPLICABILITY OF GUIDELINES:

- 1.1 **Applicability – Generally.** These Guidelines are intended to facilitate timely, orderly and efficient processing only of subpoenas, summons, civil investigative demands, search warrants, and production and court orders (“**Legal Demands**”) and **Exigent Circumstance Requests** (see [sec. 8.6](#)) issued by federal, state, or local law enforcement, regulatory agencies or courts of **United States and Canadian** jurisdictions as well as defense counsel in criminal proceedings (“Submitting Agency”) seeking wholesale customer-related information (see Sec. 1.4) for numbers in service with the Company (see Sec. 1.3), for which we will reply **only** via email. To serve trial witness subpoenas, refer to [sec. 11](#). In the alternative, see Sec. 1.6 for our online Law Portal resource (allows credentialed users to query target numbers for customer identity **without a Legal Demand**). **Law enforcement officials from jurisdictions other than United States and Canada refer only to sec. 10** (MLAT subpoena requirements).
- 1.2 **Valid Legal Demand; Agency Acknowledgment; Supplemental and Alternate Submission.** A valid Legal Demand is one which cites to legal authority, and is complete, legible, and timely served. **By submitting a Legal Demand (via email – see sec. 3.1 and sec. 8.1) or an Exigent Circumstance Request (via webform – see sec. 3.4) as invited by these Guidelines, a Submitting Agency acknowledges the applicability of the same, including, without limitation, concerning specified “Necessary Details” (sec. 4.1).** Accordingly, a Submitting Agency may be required to supplement or resubmit a held or rejected Legal Demand to conform to these Guidelines. Submitting Agencies unable to comply with requirements for email submission will be directed to the need to serve Legal Demands as per [sec. 8.3](#) or upon our registered agent. In the alternative, see also sec. 1.6 for Law Portal exception.
- 1.3 **Inteliquent/Sinch Voice Entities.** The following (collectively, the “Company” or “Companies”) accept Legal Demands consistent with these Guidelines. **Onvoy, LLC** may be served on behalf of the other entities.
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|------------------------------|--|
| **Onvoy, LLC | **Sinch Voice, operating under the legal name Inteliquent, Inc. |
| **Onvoy Spectrum, LLC | **Inteliquent, Inc. f/k/a Neutral Tandem, Inc. |
| **Broadvox-CLEC, LLC | **Neutral Tandem state-specific entities (e.g., Neutral Tandem-Iowa) |
| **Voyant Communications, LLC | **Phaxio, a division of Voyant Communications, LLC |
| **ANPI Business, LLC | **Layered Communications, LLC |
- 1.4 **Wholesale Services; CPNI Requirements:** We primarily provide **wholesale telecommunications interconnection services** to other carriers, resellers, and service providers (“**Provider Customers**”), with our network serving as a “bridge” that enables calls to occur between the end user subscribers of Provider Customers whose networks are not directly connected. Accordingly, we generally will **not** have information concerning end users of telephone numbers (the calling/called parties who are subscribers of our Provider Customers), and our typical response to a Legal Demand will be to **identify only the relevant Provider Customer(s)** and provide their contact information. The Submitting Agency can then pursue end user information through the same. Further, as a wholesale provider, we are **not a primary source of CDRs** (see [sec. 5](#)) and generally lack certain other information typically sought from **retail service providers** (see [sec. 4.1.8](#)). In observance of customer proprietary network information (“CPNI”) obligations (applicable to wholesale services -- see [sec. 7](#)), we generally must receive a valid Legal Demand (see Sec. 1.2).
- 1.5 **Civil Subpoenas:** **COMPANY DOES NOT CONSENT TO SERVICE UNDER THESE GUIDELINES, INCLUDING VIA LEArequests@sinch.com.** Rather, civil litigants must serve **only** per our Civil Subpoena Policy.
- 1.6 **Law Enforcement Portal (“Portal”):** Our Portal is **only** for use by law enforcement personnel (“LEA”) who are (a) conducting a verifiable pending investigation pursuant to which (b) the LEA would otherwise need to serve a Legal Demand to Company as a Submitting Agency to (c) obtain customer identifying information about a target number determined by the LEA as in-service with Company. Registered LEAs may **only** query numbers for which a valid Legal Demand would otherwise be served per these Guidelines. Our Portal consists of numbers that are **active in-service** on the query date for our Provider Customers who have **proactively consented** for CPNI purposes. Results returned on-screen provide customer identity and contact details. Where a number is **not** in service on query date or is in-service for a non-consenting customer, the **non-result** will direct the LEA to serve a Legal Demand per [sec. 4.1](#)). See <https://www.sinch.com/legal/lea-portal/> for more information.

2. TIMING CONSIDERATIONS:

2.1 **Generally:** Prompt submission and allowance of a reasonable compliance response interval are expected. Although processing times may vary generally and due to the nature of certain Legal Demands (e.g., voluminous requests – see [sec. 9](#)), matters submitted **consistent** with these Guidelines generally will receive a response on or before the date specified in the subject line of their submitting email (see sec. 2.2. and [sec. 4.1.2](#)). Submissions **inconsistent** with these Guidelines are subject to delayed processing (20 business days or more) or rejection altogether.

2.2 Specify Response Due Date in Submitting Email Subject Line:

While a Submitting Agency will receive an immediate automated email response from our system, our actual review will typically occur only later. Accordingly, to facilitate timely processing, the required response due date must be stated as the **first detail in the submitting email subject line** (See “Necessary Details” – [Sec. 4.1.2](#)). Our dedicated email address (see [sec. 3.1](#) and [sec. 8.1](#)) feeds submissions directly into our processing system for Legal Demands, with each new message auto-generating a new case. One field of the resulting case is populated by the subject line of a submitting email. While matters are generally processed in relative order of receipt, processing is accelerated as necessary where submission consistent with sec. 2.2 and [sec. 4.1.2](#) enables recognition of the response due date.

A. Other Date in Email Subject Line = Rejection:

No date other than the response due date is to be stated in an email subject line (e.g., issuance date, target interval, expedited date request). Where any other date is stated therein, the matter **is subject to rejection** and future email submissions from the Submitting Agency **may be declined**. As discussed herein, matters are processed in order of receipt and only accelerated to meet a specified due date. See sec. 2.2.D re: expediting.

B. No Response Due Date in Email Subject Line = Delayed Processing:

Where the date is **omitted** from the submitting email subject line, a **default response due date** (20 business days after receipt) is established in our system and processing occurs **only** based on order of receipt (we cannot review message content or attached files on an interim basis for such missing details; rather, we must reasonably expect observation of requirements for using our dedicated email address). Send a timely email request to correct the omission of a response due date (see [Sec. 8.3](#)). See also sec. 2.2.E. concerning obscured dates.

C. “Instantaner,” “Forthwith,” or “By Law” or Other Non-Date Specific Terms:

Where the Legal Demand does **not** establish a specific response due date or **only** states that a response is due within a relative interval (e.g., “within 10 days of receipt”), the email message content **must cite** provisions of law establishing any date specified in the email subject line (**including** where the Legal Demand does **not** cite to authority and/or only states “instantaner,” “forthwith,” “by law” or the like -- **never specify such terms in email subject line**). Where terms such as “instantaner,” “forthwith,” or “by law” in the Legal Demand are intended to require a response as of the date of service, then state the **actual service date in the subject line** and then account for same in the email message. Failure to do so will result in delayed processing as per sec. 2.2.B.

D. Expediting Requests; Use of “URGENT” or Similar Notations:

Never specify a matter as “URGENT” or the like **unless**: (1) the response due date is stated as the **first detail** of the email subject line and (2) that date is within 5 business days after the submitting email date. We generally **cannot accommodate** requests to expedite processing ahead of any response due date established in a Legal Demand (doing so puts a later matter unjustifiably ahead of others). Instead, we must expect Submitting Agencies (1) have issued Legal Demands bearing a response due date consistent with their needs and applicable law, and (2) submitted matters consistent with sec. 2.2 and [sec. 4.1](#) (for orderly, efficient processing).

E. Obscured Response Due Date = Delayed Processing:

As specified herein, the response due date is to be the **first detail** in a submitting email subject line. Where instead presented only in a later position (e.g., “Subpoena Attached for Request 2023-056565, for Onvoy, LLC **due 5/1/23**”), the detail may be obscured in our processing system’s display (as discussed above, the submitting email subject line populates a field in the resulting case) and accordingly, the date will not be recognized (i.e., a default response due date of **20 business days** will result per sec. 2.2.B above).

3. METHODS FOR SUBMISSION:

3.1 Legal Demands – Service via Email Submission:

1. Dedicated Email Address – LEArequests@sinch.com:

In the interest of timely, orderly and efficient processing, Company invites Submitting Agencies to transmit valid Legal Demands **via our dedicated email address** (see also [sec. 4.1](#) and [sec. 8.1](#)), which ensures our immediate, centralized receipt and processing (Legal Dept. administered processing queue) and will result in an automatic email reply from our processing system to the submitting email address (which will identify our number for the case that is automatically generated in our system by the submitted email). Accordingly, do **not** submit Legal Demands to any other email address (will not be accepted). This address is **only** for submission of **new** Legal Demands -- do **not** use LEArequests@sinch.com for any other purposes, **including** status inquiries (see [sec. 8.3](#)), number verification inquiries (see [sec. 8.5](#)), or preservation requests (see [FAQ #7](#)).

2. Auto-Reply Acknowledgment Message / Resubmission:

If an auto-reply message is not received from our system by the submitting email address in 10 minutes, do **NOT** re-send. Instead, check junk mail and network spam filter and only then call for assistance (see [sec 8.3](#)).

3. Dual Submission via US Mail:

If your jurisdiction also requires US Mail service, please refer to [sec. 8.4](#).

4. File Format:

Send all files in PDF format. If PDF is not possible, please send as TIFF file. To transmit an encrypted file or a password for a secure file, please contact via LEAstatus@sinch.com. Reference our case number for any case resulting from any submission already sent to LEArequests@sinch.com.

3.2 Legal Demands – Service via Other Than Email:

See [sec. 8.3](#) where unable to use email or otherwise conform submissions to Guidelines.

3.3 Faxes Not Accepted: Inconsistent Submissions:

Parties submitting matters to any facsimile number or otherwise inconsistent with our Guidelines **assume all risks** of disclosure, incomplete transmission, delayed receipt and processing, non-receipt, and non-processing. **COMPANY DOES NOT CONSENT TO FACSIMILE TRANSMISSION OF LEGAL DEMANDS AND WILL NOT PROCESS OR ACKNOWLEDGE ANY MATTERS SO TRANSMITTED,**

3.4 Exigent Circumstances – Web Form ONLY:

See [sec. 8.6](#) for submitting matters of immediate danger of death or serious injury. Only use our web form -- never send an exigent circumstances request via email.

4. NECESSARY DETAILS FOR LEGAL DEMANDS AND SUBMITTING EMAILS.

4.1 NECESSARY DETAILS – Generally: Observance of the following is **necessary** to ensure timely, orderly processing:

1. **COVER PAGE**: a completed form (see <https://www.sinch.com/legal/law-enforcement-support/>) must accompany each Legal Demand to collect key details for processing. Please download the form, populate all fields (fillable fields), save, and attach it as a **separate file** attached along with the Legal Demand (do **NOT** handwrite, scan, or combine with Legal Demand). Matters lacking a Cover Page may be **rejected**.
2. **EMAIL MESSAGE SUBJECT LINE**: specify **in this order** in email subject line (see also [sec. 2.2](#)):
 - (1) response due date (state as MM/DD/YY – as stated in Legal Demand or where not stated, per **cited law**)
****NEVER include any other date (e.g., issued date, target interval, or request for earlier response)****
 - (2) your agency’s reference number (e.g., subpoena or case number); and
 - (3) statement to call attention to a response due date **within 5 business days** of submission (e.g., “URGENT”).

****Example Subject Line**: “4/1/23 Due; Ref. No. 22-15837; URGENT – DUE IN 3 DAYS”

Your email subject line populates a field in the case auto-generated by your email in our processing system. If no due date is stated in subject line (we cannot interim review for missing details), **a default response due date of 20 business days** is established in our system and processing occurs **only** in order of receipt. See also [sec. 2.2](#).

3. **SINGLE SUBMISSION**: each submitting email to LEArequests@sinch.com must submit **only** one Legal Demand plus all relevant files -- see [sec. 8.4](#)). Never attach **multiple** Legal Demands to one email or combine into one PDF. See [sec. 4.1.5](#) re: multiple target numbers. Only dually submit via email and US Mail/delivery per [sec. 8.4](#). Never **resubmit** a matter; rather, inquire first **only** as per [sec. 3.1](#) and [sec. 8.3](#).
4. **TARGET INTERVAL**: Numbers may move between Provider Customers on our network, port off our network, or disconnect and be returned into service with a different customer. Accordingly, a **target date or range of dates must be stated**. Where not stated, we assume an interval of only from issuance date to response date.
5. **TARGET NUMBERS LIST**: the Cover Page (see 4.1.1) for a Legal Demand must list all target numbers (**omitting** all non-numeric characters – e.g., all hyphens, parentheses, periods). This lessens risks of transposed or erroneous digits and promotes timely processing and orderly tracking. For voluminous requests see [sec. 9](#).
6. **“REPLY TO” EMAIL ADDRESS**: if the LEA emailing the Legal Demand is not the intended recipient for our response, include the recipient as a “CC” to limit risks of illegible, transposed, or mistyped characters.
7. **ENGLISH REQUIREMENT**: all Legal Demands submitted via email to Company must be in English.
8. **RETAIL SERVICE RELATED ITEMS - DO NOT REQUEST**: As a provider of wholesale services (see [sec. 1.4](#)), we will provide **no response** to the following items in a Legal Demand (since we will either: (a) lack responsive records [i.e., about end user], or else (b) only have records relating to our Provider Customer [not the end user]). **Please omit such items and request only customer identity**. Inclusion of the below items (see also [sec. 5](#) re: CDRs) will otherwise make a Legal Demand objectionable as unduly burdensome, overly broad, and/or neither relevant to nor proportional to the needs of the Submitting Agency and **only delay processing**:
 - (a) Service applications, service agreements/contracts, service plans and account establishment documents
 - (b) Billing/payment records, including invoices, service charges, bank records and transaction-related details.
 - (c) Correspondence and records of other communications with or concerning an end user subscriber or number
 - (d) Complaints received about a target number / end user subscriber
 - (e) Other telephone numbers and/or accounts in service related to the target number or end user subscriber
 - (f) Electronic or cloud-stored content: voicemail, email, and SMS/MMS/text messages, including attached or transmitted files, images and video (our network does not capture or retain such content)
 - (g) End user subscriber equipment and ID numbers associated with the same, including SIM cards.
 - (h) IP address for the end user subscriber or wholesale customer
 - (i) Data used by the end user subscriber
 - (j) GPS or geo-location details, cell site/tower “ping” and network connection location related records

4.2 NECESSARY DETAILS – for Back Tracing of “Spoofed” Calls:

Summarize the following **per call**, and provide either in Legal Demand (or in an exhibit to same), in submitting email, or where indicated on Cover Page:

1. Calling number
2. Called number, including related numbers (e.g., toll-free + “pointed to” local number; forward from + to numbers).
3. Date and time of the call, including the relevant time zone designation (e.g., Central Standard Time)
4. Call duration.

4.3 NECESSARY DETAILS – Requests Pursuant to Intercept Arrangements:

For Legal Demands seeking customer information about a target number pursuant to a court order or warrant that established a pen register, trap and trace, or wiretap/intercept arrangement on another telephone number that is **not on our network** (“Intercept Arrangement”), the Cover Page must affirmatively state that:

1. the requested number was captured as a number called by or calling to the number subject to the Intercept Arrangement;
2. such call(s) occurred during the interval specified in the order/warrant (copy required, including relevant extension(s)); and
3. specify the order/warrant provisions which require our provision of information concerning the number(s).

See also [sec. 6.4](#) concerning aggregating numbers into a **single daily request**.

4.4 UNNECESSARY DETAILS – End User Names and Addresses (Service, Billing, Email or IP Addresses):

Company generally will not have information concerning end users of telephone numbers (the calling or called parties who are end user subscribers to our Provider Customers). Accordingly, being supplied with details about the name of the end user party, their service or billing address, their email address or their I.P. address will be unhelpful for our research. Company will be generally unable to reply to a Legal Demand that provides such other details **in lieu of a target number**. Moreover, I.P. addresses utilized by Company are not unique to any Provider Customer, let alone to any end user subscriber of a Provider Customer.

5. CALL DETAIL RECORDS (“CDRs”) / BACK-TRACE REQUESTS

5.1 Fractional Services:

As a provider of wholesale services, Company generally is not a primary source of CDRs. Company typically only provides one or more fragments of the services underlying a number in use by a Provider Customer (e.g., local transit only or inbound calls only). As such, our CDRs for a target number will represent, at best, **only a fraction** of the entire spectrum of calls for that number (i.e., we only carry traffic that a Provider Customer wants delivered over our network for a number [our Provider Customers also use the services of other wholesale providers comparable to ours] and so we will have no CDRs for those calls that **never even cross our network**). Please see Example 5.1 (next page) for illustration of this point. Moreover, any CDRs in our possession will be generally **duplicative** of those CDRs maintained by a Provider Customer (who should have CDRs for **all calls** from/to a target number utilized by their end user subscriber, including counterpart records for any traffic between our network and their network).

5.2 Archived Records:

While our CDRs for a particular number may represent a fraction of all calls involving that number, the voluminous amount of all traffic we carry for **all numbers** on our network necessitates our **prompt monthly archiving of CDRs**. Archiving occurs in **aggregate** for all traffic for all numbers in a calendar month (CDRs are **not archived** on a number- or customer-specific basis). The process to identify, retrieve and restore archived CDR data is time-consuming, will result in certain costs incurred by Company, and is likely to yield only partial results (which are duplicative of our Provider Customers' CDRs).

5.3 Secondary Source of CDRs:

Given the circumstances noted in sec. 5.1 and sec. 5.2, a Submitting Agency should **only** secondarily seek Company's CDRs (i.e., first submitting a Legal Demand to us **only** for the identify of our Provider Customer; then pursuing CDRs as well as end user subscriber information from the Provider Customer; and only thereafter, seeking CDRs as necessary from Company [e.g., for a period for which the Provider Customer lacks records]). Accordingly, as a provider of wholesale services, except for Legal Demands for which the Submitting Agency has contacted Company in advance of service (see sec. 5.5) and the Company has specifically agreed to the necessity of producing responsive CDRs, we will provide **no response** to items in a Legal Demand seeking CDRs.

5.4 Exception – Back-Tracing; Timing and Fees:

Back-tracing of “spoofed” traffic is the rare case in which we are a primary source of CDRs (i.e., where a terminating carrier's CDR establishes that Company delivered the actual traffic for a call to them, irrespective of apparent calling number). In such cases, where we identify a responsive CDR, it will identify the Provider Customer from whom we received the traffic. Allow at least 5 business days for a back-trace request for a call **within the prior 45 days**. Back-trace requests for calls more than 45 days prior will typically require archive retrieval and must allow at least 15 business days for processing (an ICB fee applies). Fees may also apply for voluminous requests. See also [sec. 4.2](#) and [sec. 9](#), as well as [FAQ item #1](#).

5.5 Contact Prior to Submitting CDR Request:

If, only after reviewing this entire sec. 5, you believe our CDRs are necessary, then email LEArecords@sinch.com to request contact from the Legal Department.

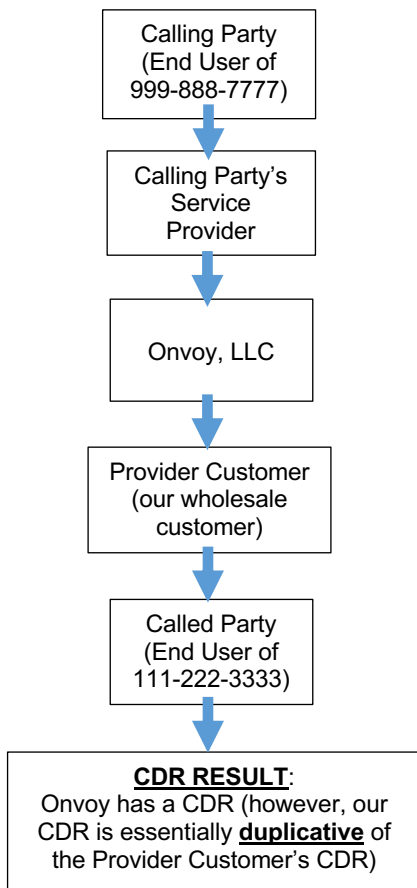
Example 5.1:

Below are a pair of illustrations that present typical circumstances in which we are not a primary source of CDRs or will altogether lack CDRs for an in-service number (i.e., where we are only providing termination services to the Provider Customer for the target number). Our services are typically provided on a very fractional basis and so there are other such scenarios in which we will lack CDRs for a number since the traffic **does not cross our network** (e.g., we may only carry voice traffic for a number and so we will have no records for messaging).

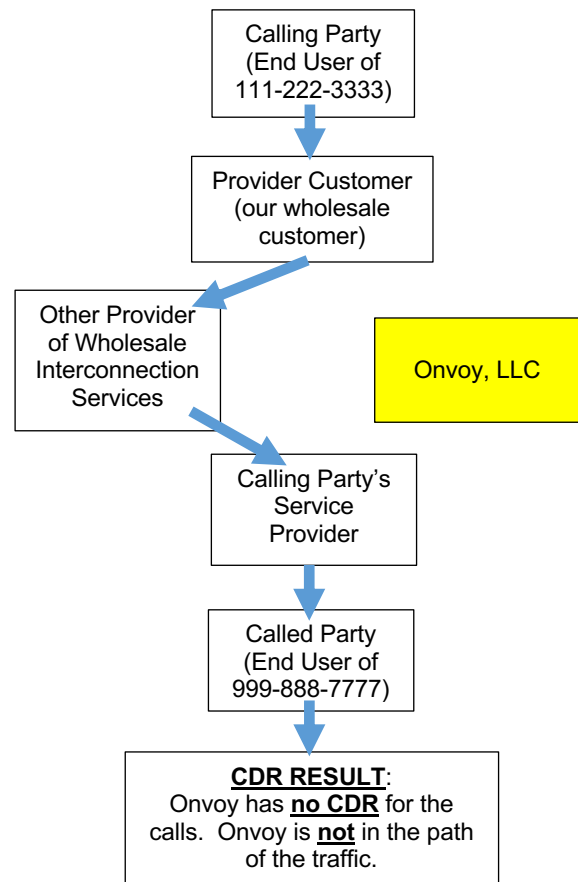
In the examples below, the number 111-222-3333 is **in-service with the Company**, and the number 999-888-7777 is **not**. Our Provider Customer is using the Company's services **only to terminate inbound calls** to the number 111-222-3333 (for which the Provider Customer has the end user subscriber using 111-222-3333 to initiate/receive calls and messages). Further, the Provider Customer is instead using **another service provider** who also offers wholesale communications interconnection services comparable to our for traffic involving the **origination of outbound calls** from 111-222-3333.

As illustrated below, a call from 111-222-3333 to 999-888-7777 will **never even cross** the Company's network (in this example, the network of our affiliate Onvoy, LLC) and accordingly, we have no CDR for the call (Ex. 5.1.B). In the inverse, a call from 999-888-7777 to 111-222-3333 results in a CDR for Onvoy, LLC; however, the Provider Customer will also have a counterpart CDR of the same call (Ex. 5.1.A). Accordingly, the Provider Customer will be the primary **source for all CDRs** for all calls to/from 111-222-3333.

Ex. 5.1.A - Call Terminating to 111-222-3333



Ex. 5.1.B - Call Originating from 111-222-3333



6. PEN REGISTER, TRAP AND TRACE, AND WIRETAP / INTERCEPT ORDERS

6.1 Generally – Limited Value:

Company typically only provides one or more fragments of the wholesale services underlying a number in use by a Provider Customer (e.g., local transit only or inbound calls only). As such, Company's network is rarely the best source for the installation of pen registers, trap and trace arrangements, and wiretap/intercepts ("**Intercept Arrangements**") ordered for a target number for which we are providing wholesale services (i.e., the Intercept Arrangement will **only** capture traffic which the Provider Customer desires to send or receive through Company). Instead, a Submitting Agency is best served to submit a Legal Demand to Company to identify the Provider Customer, and then pursue the desired Intercept Arrangement with that company.

6.2 Contact Company Prior to Order Submission:

In the limited circumstances in which we are the appropriate point for an Intercept Arrangement, a trusted third-party vendor to Company will implement the same as ordered (see 6.3). **If, after reviewing these Guidelines, you believe that Company is the appropriate Intercept Arrangement point, please** contact us (see sec. 6.5). Doing so will save time and expense, enabling us to evaluate whether the desired Intercept Arrangement might fit the limited circumstances in which Company would be an appropriate point, the applicability of fees for the Intercept Arrangement, and how to ensure our timely receipt and review of an order or warrant.

6.3 Third-Party Vendor:

Upon receipt of an order or warrant directing Company to establish an Intercept Arrangement and verification of the Submitting Agency's understanding of the foregoing limitations of an established Intercept Arrangement, Company will notify its third-party vendor, who will then contact the Submitting Agency directly to arrange for implementation. The third-party vendor is **NOT authorized** to accept service of a Legal Demand on behalf of Company. Rather, such orders and warrants must be submitted to Company as will be directed. Intercept Arrangements will only be established where Company receives an order or warrant that upon review, is determined to be a legally valid requirement for such arrangements.

6.4 Requests for Numbers Identified per Intercept Arrangement on Another Provider's Network:

Unless circumstances involve an urgent need for information about one particular number identified pursuant to an Intercept Arrangement installed **on another service provider's network**, Submitting Agencies should **only** submit a single daily aggregate request for all numbers identified via the Intercept Arrangement (do not otherwise submit more than one request per day, per Legal Demand establishing an Intercept Arrangement).

6.5 Dedicated Contact Email Address:

If, only after fully reviewing this sec. 6, you believe an Intercept Arrangement on our network is necessary, then email LEArecords@sinch.com to **request contact** from the Legal Department. **Do NOT submit an Intercept Arrangement to this address unless you are specifically directed by the Company's Legal Department** after a determination is made that our network is the appropriate location at which to install the Intercept Arrangement. Please note that this address is **only** monitored during business hours

7. CPNI STATEMENT

In compliance with the FCC Orders concerning Customer Proprietary Network Information ("CPNI") and the company's CPNI Policy, customer information cannot be released without a valid subpoena, summon, court order, civil investigative demand, agency order, search warrant or other formal demand from an agency authorized to request such information.

8. CONTACT INFORMATION FOR LEGAL DEMANDS AND EXIGENT CIRCUMSTANCES

8.1 Dedicated Email Address for Routine Legal Demands:

In the interest of the timely, orderly processing of all Legal Demands, Company requires Submitting Agencies to submit the same via the dedicated email address LEArequests@sinch.com. Email submission to LEArequests@sinch.com consistent with these Guidelines ensures the immediate, centralized receipt of valid Legal Demands, protects the contents of the same from non-disclosure (processing queue accessible only by legal department), and facilitates the efficient processing of all such matters.

8.2 Other Email Addresses / Fax Numbers:

THE COMPANY DOES NOT GENERALLY CONSENT TO THE SUBMISSION OF ANY LEGAL DEMAND TO ANY FACSIMILE NUMBER OR TO EMAIL ADDRESSES OTHER THAN LEArequests@sinch.com. Do not submit Legal Demands to any other email addresses, including without limitation, redundantly to another address at time of submission to LEArequests@sinch.com. A Submitting Agency that submits a Legal Demand to any facsimile number or other email address **assumes all risks**, as per [sec. 3.3](#).

8.3 Standard Office Hours: Contacts for Inquiries and Office Address:

Legal Department contacts are available during office hours (8:00 am to 5:00 pm Central) via email at LEAstatus@sinch.com or via telephone at 872-275-2029. Please email **only** to correct, supplement, or withdraw a submitted Legal Demand or to inquire about status (inquire **only** where a response is past due, **noting our case no. and due date in email subject line**; inquiries will not receive a response where the matter is **not** past due). **Please recognize that where your matter is past due and you did not specify the response due date for the same in the subject line of your submitting email, this will be the reason the matter is past due – i.e., we are unaware of the due date and the matter is subject to processing only in its order of receipt.** See [sec. 4.1.2](#).

Do **not resubmit** a previously submitted matter to LEArequests@sinch.com (including to inquire about status or where you have not received our system's auto-reply to your submission) unless specifically directed to do so by the Company. Each new email to LEArequests@sinch.com automatically generates a **new case** in our processing system and replies to prior messages from us go only into the pending case from which that message was issued (this will generate no alert in our system and as a result, will go unnoticed until the case is reviewed for processing). Accordingly, we have established LEAstatus@sinch.com for status inquiries. See [sec. 3.1.2](#) and [sec. 8.4](#) before contacting us.

Do **not** request number verification / confirmation (see [sec. 8.5](#)).

Please see [sec. 5.5](#) and [sec. 6.5](#) concerning CDR requests and Intercept Arrangements (separate email address).

Submitting Agencies that are unable to submit Legal Demands via email (or which must **also** dually transmit via US Mail – see [sec. 8.4](#) also) must serve such matters upon Company at the following office address, or upon a registered agent of Company:

1 N. Wacker Drive, Suite 2500
Chicago, IL 60606

8.4 Jurisdictional Requirements for Serving via US Mail / Delivery; Redundant or Serial Submissions:

1. Serve First Via Email, Then Mail/Deliver:

For jurisdictions that require service via US Mail or commercial delivery, Submitting Agencies who desire to **also** use our dedicated email address LEArequests@sinch.com should **only** transmit matters to our office address in [sec. 8.3](#) in **the following order**:

- (a) submit Legal Demand **via our dedicated email address** (per [sec. 4.1](#) and [sec. 8.1](#));
- (b) await receipt of our processing system's auto-reply to your email address, which will identify our case number (see 3.1.2 if auto-reply is not received); and then
- (c) **print a copy of the auto-reply email** to include in with the paper copy of the Legal Demand to be sent via US Mail or commercial delivery (or in the alternative, include a cover letter with the Legal Demand and specify our case number in the reference line of your cover letter).

The foregoing process avoids unnecessary time expended on duplicative handling of: (1) matters for which a prior email submission may have **already resulted in processing** for a compliance response by the time that we receive and initially review the paper submission, as well as (2) circumstances wherein a matter remains pending but is **not yet identifiable** in our processing system (due to email submission inconsistent with [sec. 4.1](#)). We now have over 100 million numbers on our network and accordingly, receive a certain volume of subpoenas. Please considerably avoid such circumstances **by simply informing us** as summarized above of the case resulting in our system from your email submission.

2. Never Submit Legal Demands Redundantly or Serially:

Submit a Legal Demand only once to LEArequests@sinch.com. Each new email to LEArequests@sinch.com automatically generates a **new case** in our processing system and replies to prior messages from us go only into the pending case from which that message was issued (this will generate no alert in our system and as a result, will go unnoticed until the case is reviewed for processing). Accordingly, never submit the same matter **more than once** (unless specifically instructed by Company), including: (1) to inquire about the status of a pending matter (instead, inquire via email per [sec. 8.3](#)) or (2) where an acknowledgment auto-reply was not received (inquire by phone per [sec. 3.1](#) and [sec. 8.3](#) after checking junk mail folder and network spam filter for our auto-reply message that is sent in response to each new email received by LEArequests@sinch.com). Instead, inquire concerning status of a pending matter via LEAstatus@sinch.com as per [sec. 8.3](#).

Never submit a single matter fractionally in a series of email messages (e.g., submitting 1 email for Legal Demand, 1 email for Cover Page Form, and 1 email for a non-disclosure order = 3 new cases in our system for the very same matter). All documents for a Legal Demand must attached in **1 case only, resulting from being sent via 1 email**. If a file is forgotten, supplement case as per [sec. 8.3](#).

Retain our system's auto-reply acknowledgment email (necessary to reference our case number if you need to contact us).

8.5 Verification Requests / Confirmation Requests:

We cannot respond to requests for verification or confirmation that a number belongs to Company. Do not present such requests by phone (including to our NOC) or via email (including to LEArequests@sinch.com). We will close cases generated in our system by such email requests to LEArequests@sinch.com (**no response will be sent**). (see **"FAQ" #5** for more information).

8.6 Exigent Circumstances Requests:

A Submitting Agency (including an emergency call center for purposes of this "Exigent Circumstances" section) must certify to Company the nature of an emergency that represents an immediate danger of death or serious physical injury, for which they lack sufficient time to obtain a subpoena, summons, court order, civil investigative demand, search warrant or production order for purposes of obtaining customer related information concerning a telephone number in service with Company ("Exigent Circumstance Request"). Exigent Circumstance Requests are submitted **only** via the following:

<https://www.sinch.com/legal/exigent-circumstances>

Company **cannot perform a "GPS Ping" on a number**. Please do not submit such requests. Please instead request customer information by use of the web page form at the above address.

Company's response to any Exigent Circumstances Request is **entirely conditioned upon** the agency's subsequent provision of a subpoena, summons, court order, civil investigative demand or search warrant to Company for any information provided as soon as circumstances permit the agency to obtain the same thereafter. By submitting an Exigent Circumstances Request to Company, the agent certifies to Company: (a) the information provided is true and correct; (b) the existence of Exigent Circumstances; (c) the Submitting Agency will provide a Legal Demand to Company as soon as circumstances permit; and (d) the agent has the authority to make the Exigent Circumstances Request on behalf of the agency and further, to commit the agency to subsequently obtain and provide the corresponding Legal Demand.

9 VOLUMINOUS REQUESTS

Given that the Company offers registration for and use of its Law Portal at no cost to law enforcement personnel (see [sec. 1.6](#)) and allows querying up to 25 numbers/day per user through the same, it is the Company's reasonable expectation that most Voluminous Requests (defined herein) are avoidable through diligent planning and use of our Law Portal, as well as responsible, timely communication with the Company. Accordingly, Company **may object** to Legal Demands received from Submitting Agencies seeking customer identifying information for **25 or more telephone numbers** ("Voluminous Request") after making a good faith determination of one or more of the following: the Voluminous Request is unduly burdensome, overly broad, neither relevant to nor proportional to the needs of the litigation, and/or fails to allow reasonable time for compliance.

The Company may determine that multiple Legal Demands constitute a Voluminous Request in the aggregate based on commonalities between the same (e.g., numbers identified under same Intercept Arrangement on the same date or on dates in close proximity; service by same officer/agent or agency)

The Company may base its good faith determination in part upon a prior Voluminous Request served by the same Submitting Agency (e.g., one which included an unacceptable quantity of target numbers that were not in-service with the Company during the relevant target interval ["Erroneous Numbers"] and/or numbers that the Submitting Agency failed to correctly resolve via use of the Law Portal).

Where objection is presented to the Submitting Agency, the Company may present certain conditions for nevertheless processing the Voluminous Request, including, without limitation, one or more of the following:

1. A reasonable processing fee to compensate the Company for the undue burden imposed;
2. Registration of Submitting Agency personnel for the Company's Law Portal (see [sec. 1.6](#)) and use by same to first query all target numbers and return to the Company a list of only those numbers not resolved by the Portal;
3. A reasonable extension of time;
4. Agreement to processing only a reasonable subset of the target numbers as compliance in full;
5. Cessation of processing where an unacceptable quantity of Erroneous Numbers are identified in processing at least 25% of the Voluminous Request and returning the unprocessed numbers to the Submitting Agency for further screening against its resources and re-submission.

Where a processing fee is necessary, the Submitting Agency will be presented with a cost and time estimate. The Submitting Agency must then provide written authorization for the same before the Company will commence processing.

To avoid the necessity of objection and any delayed processing resulting concerning a Voluminous Request, pre-service inquiry is welcome to LEAstatus@sinch.com or via telephone at 720-590-7085 (see [sec. 8.3](#)) to seek clarity concerning the foregoing and discuss the potential Legal Demand.

A request for CDRs (other than a specific back tracing request) may also constitute a Voluminous Request under these Guidelines. All parties who believe they may desire to seek CDRs from the Company are strongly encouraged to first review [sec. 5](#).

10 MUTUAL LEGAL ASSISTANCE TREATY (“MLAT”) SUBPOENAS

As a company based in and operating throughout the United States and also being a registered reseller in Canada (as Onvoy, LLC), the Company will accept Legal Demands **only from US and Canadian Submitting Agencies** pursuant to these Guidelines generally.

Law enforcement agencies from jurisdictions **other than** the US and Canada (“MLAT Agencies”), however, must observe MLAT Subpoena requirements for service of legal process consistent with only this sec. 10 (secs. 1 through 9 **do not apply** for legal demands from MLAT Agencies, including, without limitation, [sec. 1.6](#) concerning our Law Portal – we do not offer Law Portal registration to officials from MLAT Agencies).

If you are an MLAT agency, and unfamiliar with MLAT subpoenas, please consider referring to the following, which are available through the United States Department of Justice (“DOJ”) and may be helpful for your agency’s consideration of pursuing this matter through the DOJ’s Office of International Affairs:

<https://www.justice.gov/criminal-oia/file/1498811/download>

<https://www.justice.gov/criminal-oia/file/1498806/download>

Please note, we generally do not have end user subscribers. Rather, our customers are typically other service providers (wireline, wireless, VOIP, etc.) to whom we provide **wholesale communications interconnection services**, delivering traffic between the networks of such other providers involving telephone numbers that either: (a) were allocated to us as part of a numbering block and released to such a service provider customer for their use, or else (b) already in-service with a service provider who has ported the number to our network. In either case, the telephone number belongs to another service provider, who has the end user subscriber(s) utilizing the number and who will have records relating to all use of the number (**we will have no relationship with or information about the end user subscribers of our wholesale customers**).

Accordingly, in most instances, the useful information that we can provide to a MLAT Agency is to identify the service provider who is our wholesale customer (**the party who is actually providing retail services to the end user subscriber**). The MLAT Agency will need to still then pursue the matter through that party to seek the identity of the end user subscriber as well as the records of our wholesale customer that are commonly sought (e.g., call detail records, billing/payment records, end user equipment information, identification of related telephone numbers).

Where pursuing an MLAT subpoena through the DOJ, following is our contact information for service via the DOJ:

Inteliquent, Inc.
1 North Wacker Drive, Suite 2500
Chicago, IL 60606
LEArequests@sinch.com

*An MLAT subpoena may also be addressed to us using the legal entity name Onvoy, LLC or using our brand name of “Sinch Voice.”

11 LEGAL DEMANDS REQUIRING TRIAL WITNESS APPEARANCE

As discussed in [sec. 1.4](#), we primarily provide **wholesale** telecommunications interconnection services to Provider Customers – our network serves as a “bridge,” enabling calls between end user subscribers of the same. Accordingly, the Company generally:

- (1) will **not** have information about or any relationship with end users (calling/called parties) of Provider Customers or other information that is typically sought from providers of **retail** services (see [sec. 4.1.8](#));
- (2) will be, at best, a secondary source of CDRs (see [sec. 5](#)); and
- (3) will respond to a Legal Demand to only provide **customer identifying information** concerning the relevant Provider Customer(s).

As such, we generally will be an **undesirable trial witness** (i.e., end user information should be sought only through our Provider Customer, **including** seeking that party’s appearance instead as a trial witness).

Where a Company representative is sought as a trial witness, the relevant Legal Demand must specifically provide for the our ability to satisfy the same **in lieu of appearance at trial via email provision** of customer identifying information about the Provider Customer by a specified date in advance of trial.

In the event that the appearance of a Company representative as a **trial witness** will be the **only way** in which the Company can satisfy a Legal Demand, service of process for same must occur **only** via commercial courier delivery to the address provided in [sec. 8.3](#) or upon the Company’s registered agent. **Never email** a Legal Demand requiring compliance **only** via trial witness appearance to LEArequests@sinch.com or any other address for the company. The Company **does not consent** to email service of such Legal Demands and the same will be rejected (or where deemed as served per applicable law, objected to) upon discovery of such content of the same.

If, only after fully reviewing this section, you believe that you must require a Company representative to appear as a trial witness, please contact us as provided in [sec. 8.3](#) before attempting to serve your Legal Demand.

LEGAL COMPLIANCE FAQs

1. Is there a fee for providing a response to a Legal Demand?

Typically, Company will not charge a fee for Legal Demands that seek only customer information about a routine quantity of target numbers. Fees may apply for Legal Demands that are determined by Company to be seeking information about a voluminous quantity of target numbers, including for individual Legal Demands which amount to a voluminous quantity in the aggregate or which involve exceptional costs to be incurred by Company for retrieval and restoration of archived records. See [sec. 9](#) (Voluminous Requests) and [sec. 5.4](#) (CDRs) for further details.

2. Do you notify your customer upon receipt of a Legal Demand?

As noted above, we primarily provide **wholesale communications interconnection services** only to Provider Customers (see [sec. 1](#)). Accordingly, we generally do **not** notify our Provider Customers of receipt of Legal Demands from Submitting Agencies. Customers may be provided notice, however, of the receipt of a subpoena in a civil litigation matter. As provided above, parties to civil litigation matters must serve civil subpoenas consistent with our **separate** Civil Subpoena Policy.

3. If my Legal Demand is defective, will you still accept it for processing?

No. Company generally cannot accept any secondary document to resolve defects or inconsistencies within the provisions of any Legal Demand received, including without limitation, the absence of a necessary signature, an erroneously stated target number, one or more missing pages, or the submission of the matter only after the response due date provided for in the Legal Demand. Company must receive a Legal Demand that is complete, timely submitted, and which creates a legal obligation for Company to produce the information specified in the Legal Demand (and any exhibits and/or attachments which are clearly referenced in and are part of the Legal Demand), including citation to authority for the Legal Demand.

Any Legal Demand received only after the response due date established in the same will be presumed void, and the Submitting Agency will be requested to affirm in writing to Company that a provision of law requires the Legal Demand to nevertheless be regarded as valid (despite untimely service of the same), and a legal requirement for Company's response. Such writing must also establish a reasonable interval for Company's compliance response (such interval being comparable to the original interval between issuance of the Legal Demand and the response due date established therein).

4. Do you accept Legal Demands directed to Vitelity Communications, LLC; Vitelity, LLC; VCLS, LLC; Infotelecom, LLC; 360networks (USA), Inc.; or Zayo Group, LLC.

No. We will not respond to any Legal Demand directed to any of the above-named companies. We will only respond to Legal Demands directed to one of the companies listed in [sec. 1.3](#) of these guidelines.

5. I know that the Company mainly provides wholesale communications interconnection services and that numbers frequently move between service providers. Is a Legal Demand really required, and can you at least verify in advance if the number is with your company?

A Legal Demand is a general requirement. While our customers are typically Provider Customers, we must nevertheless observe CPNI requirements (please see our “CPNI Statement” – [sec. 7](#)).

It is understood that Submitting Agencies only want to submit Legal Demands to the service provider who possesses the information desired. However, we must process Legal Demands as a priority and consistent with compliance intervals specified for the same. Moreover, we must expect that all Submitting Agencies adequately investigate matters and utilize their resources to identify us as the relevant service provider for a target number. **Accordingly, we cannot accommodate requests to verify a telephone number either by telephone call or by message to any email address (see also [sec. 8.5](#)).** We recognize that this may represent some inconvenience; however, given the volume of Legal Demands we receive as a wholesale provider, we cannot escalate such inquiries above the processing of pending Legal Demands.

While we cannot give customer identity or verify numbers by phone or email, we have, established our Law Enforcement Portal, which may otherwise address the needs of law enforcement. Our Portal consists of numbers that are **active in-service** on the query date for our Provider Customers who have **proactively consented** for CPNI purposes. Our Portal allows Registered LEAs to query numbers for which a valid Legal Demand would otherwise be served per these Guidelines, and results returned on-screen provide customer identity and contact details for a present customer. See [sec. 1.6](#) for further details.

6. My agency only wants to request the disruption of service for one or more numbers, not information. What do we need to do?

Disruption requests must refer to a statutory or other basis supporting the request; clearly identify the target number(s) (including specifying date(s), time(s), and applicable time zone); summarize use of the target number(s) that is the basis for the request; and either produce documentary evidence of such use or sufficient details that enable Company to verify such use or otherwise recreate use consistent with the summary provided.

7. My agency only wants to request the preservation of records held by your company at this time. What do we need to do?

A Preservation Request to Company will not be beneficial to your agency – you will not want our records or their preservation. Instead, you will want to promptly issue your Legal Demand (see [sec. 1.1](#)) to Company to request only the identity of our customer for your target number. Company’s customers are typically Provider Customers (see [sec. 1.4](#)). Through such Provider Customers, your agency can pursue the end user subscriber information sought by your agency (as a wholesale service provider, Company generally has no relationship with or information about the end user subscribers of our Provider Customers, and further, is not a primary source of CDRs). Company can provide no information in response to a Preservation request.

Accordingly, a Submitting Agency should not delay issuance of a Legal Demand seeking customer identifying information from Company. In response, Company will identify our Provider Customer(s) for the target number(s) and supply contact information for the same. The Submitting Agency can then issue a preservation request to the Provider Customer to ensure the preservation of end user subscriber information and/or CDRs sought by your agency for the interim.

8. Do you accept Canadian Legal Demands? What about other non-US jurisdictions?

Onvoy, LLC is a registered reseller in Canada. As such we do accept Canadian Legal Demands, submitted in English in accordance with our Guidelines. **Please note that Onvoy, LLC does NOT have premises in Canada.** All Legal Demands from US and Canadian authorities must be served via our dedicated email address – LERequests@sinch.com. Law enforcement agencies from jurisdictions **other than** the US and Canada must observe MLAT Subpoena requirements (see [sec. 10](#)).