



THE LATEST NEWS, VIEWS, & ANNOUNCEMENTS

INSIDE

**Legislation Watch**

A new FCC rule went into effect in January 2024. We weigh in on its impacts for U.S. service providers and how our Trust & Safety team will support you.

**The Interview**

In this edition, we sat down with one of Raven’s board members, Kevin Metcalf, whose work is critical in combating child sexual exploitation.

**Corporate News**

We honor our founder and CEO, Steve Bock, who was recently awarded by the Colorado State Patrol for his continued support of law enforcement and public safety.

**CEO Perspective: Spotlight on Charity - Raven**

-By Steve Bock, Founder & CEO

The core of Subsentio’s mission is to save lives and nothing is more vital than saving the lives of our children, which is why in this edition, I wanted to highlight the important work of the non-profit organization, Raven.

Raven is the first and only 501(c)(4) non-profit organization that is dedicated to fighting against child exploitation. They work to protect children from abuse and exploitation by lobbying for changes in laws and policies, providing support to law enforcement, and raising awareness about the issue.

Our children are our future, and we support Raven in their efforts to combat child exploitation. They actively lobby for changes in laws and polices that prevent child exploitation from occurring and provide better support for victims. They also provide support to international, national, and state law enforcement agencies that are investigating child exploitation cases.



Raven also raises child exploitation awareness through public education campaigns and outreach programs. Raven is a vital non-profit organization that is making a real difference in the lives of children. They work tirelessly to protect children from abuse and exploitation and to bring perpetrators to justice.

If you are interested in learning more about Raven or supporting their work, please visit their website at <https://raven.us/>.

## Legislation Watch: FCC Issues Rule for Traceback Requests

-By Gina Alzate, Director of Trust & Safety

The Federal Communication Commission (FCC) issued “Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor (47 CFR Parts 0 and 64),” which alters the response time for domestic service providers’ traceback requests response time. The new rule went into effect on January 8, 2024, and requires all U.S. domestic voice service providers to respond to any traceback request within 24 hours of receipt.

Citing that rapid traceback is essential to identifying both callers placing illegal calls and the voice service providers that facilitate them, the new rule requires that responses for traceback requests must be fully responded to within 24 hours of receipt of the request. The 24-hour requirement replaces the prior requirement for requests to be responded to “fully and in a timely manner.”

The rule applicability is for all traceback requests from the FCC, civil and criminal law enforcement, and the industry traceback consortium, with specifically identifying the 24-hour requirement. The expanded rules are intended to protect consumers from illegal calls, hold service providers responsible for the calls they carry, and aid in the identification of bad actors.

Further, the rule also direct the service providers to block and mitigate illegal traffic when notified by the enforcement bureau.



Subsentio’s Trust & Safety group manages requests for an ever-expanding number of communication service providers, working closely with our client’s compliance group. Our clients are already operationally protected in compliance with the new rule, and we handle the traceback requests as exigent requests to meet the new 24-hour requirement.

The request validation procedures performed by the Trust & Safety group have been adjusted to include the FCC and the industry traceback consortium as authorized requestors. Any network mitigation activity remains the responsibilities of the service provider.

Subsentio remains vigilant in staying abreast of new laws, regulations, and rules to keep our clients in compliance. We recognize the challenges in compliance with this new FCC rule and are here to guide our clients in implementing the necessary measure to ensure compliance.

Our Trust & Safety team specializes in all aspects of compliance, and we are prepared to support our clients to meet the new FCC rule requirements quickly and efficiently.

Contact us today to learn more about how we can help you comply with the new FCC rule. The new rule can be found on the Federal Register’s website, [Advanced Methods to Target and Eliminate Unlawful Robocalls](#).



## Interview with Kevin Metcalf, Board Member of Raven

-By Tamara Moorman, Commercial Manager

### Kevin Metcalf's Biography

Kevin Metcalf is a prosecutor and former federal agent focused on child exploitation prosecution and prevention. He is a board member of Raven and the founder of the National Child Protection Task Force, which consists of experts in legal strategy, dark web, geospatial mapping and analysis, OSINT, cryptocurrency, image geolocation and analysis, and more to aid law enforcement agencies worldwide on cases involving missing, exploited, and trafficked children.



**Tamara:** Would you tell us a little bit about yourself and your background?

**Kevin:** I've been involved in military, federal, state, and local law enforcement for over 30 years. After being on the investigative side for a long time, I went to law school and have been a prosecutor for about 12 years. If you had asked me if I was going to be involved in technology in any way 15 years ago, I would have said it is not going to happen. At the time, I was more focused on counterterrorism, drugs, and other crimes.

When I began my career as a prosecutor, I already had 20 years of experience in law enforcement but no experience in prosecution, which made me the "new guy." So, I was really focused on finding a way to add value and landed on where criminal behavior, technology, and the law intersect. Our legal system and laws are very slow to adapt and address changing technologies for a variety of reasons. From that intersection, I became aware of crimes against children.

If you consider the global reach a large technology company has, predators will have access to that same technology. While we all benefit from this technology, it is also a double-edged sword. For every benefit we receive, there is also a dark side to technology. Too often that dark side runs under the radar, and we don't see the predators talking to our kids when we're driving them into school, on their gaming systems, or while they're on their school's internet.

**Kevin:** When I saw how little attention this issue received, I decided to focus my career on the investigative tradecraft to deal with the cases that were slipping through our fingers. It's not enough to just investigate, we must investigate and prosecute successfully. So, we need to combine investigators with prosecutors to keep them going together. So that has been my main focus of my career.

**Tamara:** Would you describe the charity, Raven?

**Kevin:** Raven is a 501(c)(4) non-profit charity primarily made up of retired Internet Crimes Against Children (ICAC) commanders. Their mission is focused on obtaining more funding, training, and resources for ICAC units around the United States. Child sexual abuse materials (CSAM) is shared basically forever on the dark web between perpetrators almost as a form of currency, which re-victimizes the child as it was one of the lowest points in their lives.

ICAC, nationwide, only receives \$60 million in funding and that's if it is fully funded. When you start looking at the sheer magnitude of these images and videos and compare that to the amount of funding it receives, you realize it is not nearly enough to protect our children, especially considering other types of criminal investigations have budgets in the billions of dollars. That's where Raven comes in.

Raven reviews bills that incentivize technology companies to act in response to this epidemic.

## Interview with Kevin Metcalf

-By Tamara Moorman, Commercial Manager

**Kevin:** Raven's CEO, John Pizzuro, spends most of his time speaking to law makers on the national and state levels to encourage these types of laws. Recently, Raven supported a bill that the South Dakota Senate passed into law that will require those convicted of a crime to pay fees for digital examination and would directly fund the South Dakota ICAC.

When people consider a non-profit, they mostly think of 501(c)(3) which is your typical tax-deductible charity, but you're limited on your ability to lobby and speak to lawmakers. As a 501(c)(4), Raven doesn't get the tax benefits, but we are a non-profit lobbyist group, which means we spend most of our time speaking to lawmakers at the state or national level.

**Tamara:** How did you become involved with Raven?

**Kevin:** Given my background in prosecution and investigations in child exploitation and trafficking, I was asked to join Raven as one of the original founding members. I leverage my expertise in technology and human behavior to review and evaluate upcoming laws and bills and participate in brainstorming on its impact on child sexual exploitation. I add value by reviewing the law as a prosecutor, which is different than as an investigator or policy-maker.

**Tamara:** How could our readers support Raven?

**Kevin:** We're always looking for donations as that's always a struggle for any non-profit. Outside of that, look for ways that you can build awareness on the issue, follow Raven and John Pizzuro on social media, go to the website and look at some of the bills that we're discussing. You can also build support for ICAC units in each state and on a national level. We need people calling their political representatives and expressing an interest in getting more money into this fight. These are our children and the childhood of this nation is being destroyed by this epidemic. This cannot continue if we want to build a strong generation that's going to replace us. We must save that generation right now, and quite honestly, we're not doing it. I've heard politicians say they're one inch deep but a mile wide.

## Are you prepared?

The past few years have seen several new privacy laws passed across the United States. New consumer data privacy laws will go into effect in July 2024 in Texas, Oregon, and Florida, and in October 2024, a new privacy law in Montana will go into effect.

Contact Subsentio at [sales@subsentio.com](mailto:sales@subsentio.com) to see how our Trust and Safety Team stays abreast of the changing privacy landscape.

**Kevin:** They know a little bit of a whole lot of things, but they can't get into depth on anything. So, we need people to express to their representatives that this issue is important, and they need to pay attention to what Raven is saying.

Additionally, I am organizing a Human Trafficking and Cyber Investigations conference in June. We're building a collaboration between multiple states, multiple agencies, and non-profits. We're also bringing in prosecution and survivor services. Our goal is to pull them together in one location. We're looking at technology, after-care, and prosecution for this conference.

The event is for law enforcement and approved organizations only, so please spread the word about the conference and join if you qualify. Please see our website for more information: <https://www.eventbrite.com/e/human-trafficking-and-cyber-investigations-conference-registration-800403367017>



## Honorary Colonel's Luncheon

-By Tamara Moorman, Commercial Manager

We are proud to announce that Subsentio Founder and CEO, Steve Bock, became an honorary Colonel in the Colorado State Patrol in December 2023. This magnificent honor and achievement recognizes Mr. Bock's decades of experience supporting law enforcement and his mission of protecting the public.

This award serves as an inspiration to all of us at Subsentio and underscores the positive impact your collaborative spirit can have in saving lives and fostering a safer society. We are grateful for your unwavering support, and we look forward to your continued leadership in the years to come.

Mr. Bock also serves as Chairman of the Board of the Citizens Appreciate State Troopers. Thank you for dedication to the mission!



## CORPORATE NEWS



### New Subsentio Academy Courses!

We've added several more Academy courses over the next few months.

- Level 1: April 9th - 11th hosted by Moore County NC Sheriff's Office
- Level 2: April 22nd - 26th hosted by Indiana State Police
- Level 1: May 7th - 9th hosted by Shorewood WI Police Department
- Level 1: June 4th - 6th hosted by the Florida Department of Law Enforcement

Interested in hosting a course? Contact Subsentio Academy at [academy@subsentio.com](mailto:academy@subsentio.com) for more information!

## Virtual Subsentio Academy Class

-Adele Spell, Director of STAT Business Unit

Subsentio is working with our partners at Precision Cellular Analysis (PCA) to develop a fully virtual class for our Level 1 - Fundamentals of Cellular Analysis course.

To further our mission to save lives, we are introducing a virtual Subsentio Academy class, which will expand the potential students to the entire United States. We hope moving to a virtual classroom will provide the opportunity for law enforcement, prosecutors, and other qualifying students to join our class from the convenience of their office or home.

Regardless of whether in-person or virtual, the core of our curriculum will still involve practical exercises and real-world examples to employ the techniques learned in the course.

Interested in learning more about our forthcoming virtual course? Contact us at [academy@subsentio.com](mailto:academy@subsentio.com) to get more information. Stay tuned for updates in future Wire editions!

