

OOMA INC
Form SD
May 31, 2018

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

FORM SD

SPECIALIZED DISCLOSURE REPORT

OOMA, INC.

(Exact name of registrant as specified in its charter)

Delaware
(State or other jurisdiction of
incorporation or organization)

001-37493
(Commission

06-1713274
(IRS Employer

File Number)
525 ALMANOR AVENUE, SUITE 200

Identification No.)

SUNNYVALE, CA 94085

(Address of principal executive offices, zip code)

Spencer D. Jackson, (650) 566-6600

(Name and telephone number, including area code, of the person to contact in connection with this report)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2017.

Section 1 - Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

This is the specialized disclosure report (Form SD) for Ooma, Inc. and its subsidiaries (collectively, the Company , we or our), filed with the United States Securities and Exchange Commission (SEC) pursuant to Rule 13p-1 under the Securities Exchange Act of 1934 (the Rule) for the reporting period from January 1, 2017 to December 31, 2017. The Rule was adopted by the SEC to implement reporting and disclosure requirements related to conflict minerals as directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act). The Rule imposes certain reporting obligations on SEC registrants whose manufactured products contain conflict minerals which are necessary to the functionality or production of their products. Conflict minerals are defined as cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tin, tantalum, tungsten, and gold (3TG) for purposes of this assessment. For products which contain conflict minerals, registrants must conduct in good faith a reasonable country of origin inquiry designed to determine whether any of the conflict minerals originated in the Democratic Republic of the Congo (DRC) or an adjoining country. Numerous terms in this Form SD and the Conflict Minerals Disclosure contained therein are defined in the Rule, Form SD and SEC Release No. 34-67716 issued by the SEC on August 22, 2012 and the reader is referred to these materials for such definitions.

Conflict Minerals Disclosure

1. Company Overview

Ooma creates powerful connected experiences for businesses and consumers. Our smart SaaS platform serves as a communications hub, which offers cloud-based telephony, home security and other connected services. Our business and residential communications solutions deliver our proprietary PureVoice high-definition voice quality, advanced features and integration with mobile devices, at competitive pricing and value. Our platform helps create smart workplaces and homes by providing communications, monitoring, security, automation, productivity and networking infrastructure applications.

We drive the adoption of our platform by providing communications solutions to the large and growing markets for business, residential and mobile users, and then accelerate growth by offering new and innovative connected services to our user base. Our customers adopt our platform by making a one-time purchase of one of our on-premises appliances, connecting the appliance to the internet, and activating subscription services, for which they primarily pay on a monthly basis.

Our services run on our unique platform consisting of four proprietary elements: our multi-tenant cloud service, custom on-premise appliance, mobile applications and end-point devices. Ooma's cloud provides a high-quality, secure, managed, and reliable connection integrating every element of our platform. Our on-premise appliances

incorporate both a custom-designed, Linux-based computer and a high-speed network router, with several key features, including wireless connectivity to end-point devices and custom firmware and software applications that are remotely upgradable and extensible to new services. Our mobile applications enable customers to access our product features from anywhere, and our end-point devices enable additional functionality and services. Our platform powers all aspects of our business, not only providing the infrastructure for the communications portion of our business, but also enabling a number of other current and future valuable productivity, automation, monitoring, safety, security, and networking infrastructure applications.

2. Overview of Products

The following products are manufactured by the Company's contract manufacturers and contain conflict minerals (such as gold, columbite-tantalite (coltan), cassiterite, and wolframite (including their derivatives, tantalum, tin and tungsten)) that are necessary for their functionality or production:

Ooma Office is a fully-featured multi-user communications system for small businesses of any size, providing everything needed to manage communications in and out of the office with a suite of powerful features at an affordable price.

Ooma Office consists of an on-premises appliance (base unit) and an Ooma Linx end-point device, which wirelessly connects regular desktop telephones and fax machines to the user's high-speed internet connection.

Residential Communications

Ooma Telo is a complete home communications solution designed to serve as the primary phone line in the home, delivering high-quality voice communications and unique and valuable features. Users buy an Ooma Telo and plug it into a high-speed internet connection and standard home phone devices.

Ooma Telo supports a line of accessories, or end-point devices, to expand the capabilities of the system to serve the needs of an entire household:

Ooma handset. Cordless handset delivering smart features, such as the ability to sync the phone book with online contacts and display picture caller ID by syncing with social media. One-touch voicemail access lets users check messages anywhere in the home and the intercom button allows them to talk between handsets or transfer calls.

Wireless + bluetooth adapter. Allows users to install the Ooma Telo device anywhere in the home within range of their wireless network. Bluetooth is used to pair Bluetooth-enabled mobile phones to the Ooma Telo so that incoming calls on the user's mobile phone can ring on the user's home phones.

Safety phone. A wireless, small form-factor, hands-free speakerphone that can be worn as a pendant. Two speed dial buttons can each be preset with up to three different numbers, including 911. The preset buttons can also be configured to trigger e-mails or SMS notification alerts when assistance is requested. The Safety Phone supports two-way voice communication and can also be used to answer phone calls.

Home Security

Ooma Home is a comprehensive do-it-yourself home security solution that connects to Ooma Telo and provides safety for homeowners when at home or away. The system includes motion, water, door and window, and garage door sensors in addition to the unique ability to remotely place a local 911 call from the home. Ooma Home also now includes geofencing capabilities to automatically arm and disarm the security system, and in the near-term we plan to add a siren and a smoke detector. The Ooma home security app is the interface through which users can interact with Ooma Home to pair sensors, toggle between home, away and vacation modes, and manage and receive notifications.

3. Supply Chain Overview

Our supply chain is complex. As regards conflict minerals, there are multiple tiers between our Company and the mines. Accordingly, we rely on our direct and indirect suppliers to provide information on the origin of the conflict minerals contained in the components used in the Ooma office base stations, phones, handsets, Bluetooth adapters, headsets and security sensors.

The methods we used to try to determine the origin of conflict minerals in our products included:

Conducting Reasonable Country of Origin Inquiry (RCOI) by requiring our direct and indirect suppliers to complete the Responsible Business Alliance (RBA) and the Global e-Sustainability Initiative (GeSi) template;

Reviewing responses received from suppliers and following up on inconsistent or incomplete responses; and

Sending reminders to suppliers who did not respond to our requests.

4. Reasonable Country of Origin Inquiry Results and Conclusion

We conducted a RCOI of our direct and indirect suppliers using the template developed by the RBA and the GeSi, known as the Conflict Minerals Reporting Template.

After reviewing all of the responses, we determined that we have no reason to believe that any of the conflict minerals used in the manufacture of our products, may have originated in the DRC or any adjoining country during 2017, all within the meaning of the Rule. We conducted our RCOI in good faith, and we believe that such inquiry was reasonable to allow us to make our determination.

5. Continued Steps to Mitigate Risk

We intend to take the following steps in order to improve our RCOI process and to further mitigate risk that any conflict minerals in our products could benefit armed groups in the DRC or adjoining countries contributing to human rights violations:

Continue to conduct and report annually on supply chain RCOI for the applicable conflict minerals;

Examine the possibility of including conflict mineral clauses in new or renewed supplier agreements such as requiring representations of compliance with our Conflict Mineral Policy;

Engage with suppliers and direct them to training resources to attempt to improve the content of the supplier survey results; and

Attempt to validate supplier responses using information collected via independent conflict free smelter validation programs such as RBA/GeSI and Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Program (RMAP).

6. Conflict Minerals Policy

Ooma has a conflict minerals policy which can be found on the Company's website.

This Conflict Minerals Disclosure is available on the Company's website at: <https://www.ooma.com/company/>.

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the undersigned hereunto duly authorized.

OOMA, INC.

By: /s/ Spencer Jackson
Name: Spencer D. Jackson
Title: Vice President and General Counsel

Date: May 31, 2018