

Robocall Mitigation Plan

Business Information

Syndeo LLC
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Contact for Robocall Mitigation Issues

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Overview

In the Commission's release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outlines "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

Syndeo LLC ("Syndeo") is a small VSP dedicated to stopping illegal calls from originating in our network and monitoring the calls traversing our network. As certified in the FCC's Robocall Mitigation Database, Syndeo has fully implemented STIR/SHAKEN. In compliance with the R&O, Syndeo submits this RMP and certification.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51, Syndeo provides the following information concerning its upstream voice service carriers:

Bandwidth.com
900 Main Campus Drive
Suite 100
Raleigh NC 27606
Stephen Thayer
(855) 864-7776
voicesecurity@bandwidth.com

Level 3 Communications, LLC
100 CenturyLink Dr.
Mailstop: 3TCW088.2
Monroe LA 71203
Philip Linse
(303) 707-3844
philip.linse@lumen.com

Inteliquent, Inc.
550 W. Adams St.
Suite 900
Chicago IL 60661
Stacy Graham
(217) 862-1953
stacy.graham@sinch.com

Syndeo follows procedures to ensure that it knows the identities of all its upstream carriers from which it accepts traffic. To the extent that Syndeo were to receive information from law enforcement or other sources that a customer is engaged in illegal robocalling, our policy is to cooperate fully, including providing the identity of any suspected illegal robocaller, pursuant to legal service or process. While Syndeo's agreements with its upstream providers contain no provisions specific to robocall mitigation, Syndeo has received assurances from them that they have, and will continue to, sign calls transmitted to Syndeo, and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to you.

Know Your Customers

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with Syndeo in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

New Subscribers

Syndeo's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s); and
- nature of the customer's business.

Also, all new subscribers go through identity verification protocols. Syndeo rate limits the number of calls per second that can be initiated. All Caller ID's must match customer records and cannot be changed.

Acceptable Use Policy

Syndeo maintains an Acceptable Use Policy ("AUP") that subscribers must sign before being permitted to use Syndeo's network. The AUP is found at <https://www.broadvoice.com/acceptableuse/>

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Syndeo and/or obtained by Syndeo from one of Syndeo's underlying carriers for use by the subscriber. In most cases, Syndeo directly manages the TNs used by its subscribers. Syndeo tracks these numbers in its inventory system and monitors the assignment of these numbers. In these cases, TN validation is the inherent result of Syndeo's assignment of the TN to its subscriber.

If a subscriber wishes to use a TN as a caller identity and that TN is not directly managed by Syndeo, then TN validation is necessary. If a subscriber's end-user can provide a valid letter of authorization that they are the authorized user of such TNs, Syndeo will attest calls originated with these TNs.

When originating a call, Syndeo checks the calling party number against Syndeo's inventory and will not attest the call unless the calling party number is a TN that has been properly validated.

During Service

All subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP originated calls are signed with subscriber caller ID only after number validation via SMS; and
- Requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Monitor Traffic with Analytics

Syndeo utilizes a system it purchased from TransNexus that flags suspicious activity in real time and alerts our fraud team to respond. Examples of suspicious activity include:

- Anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and

- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

Syndeo does not work with third party vendors to deploy its analytics.

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, our risk prevention team is alerted which follows the defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Syndeo follows Industry Traceback Group (“ITG”)-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Syndeo will devote sufficient resources to provide prompt and complete resources to traceback requests. **Syndeo certifies that it will comply with traceback requests within 24 hours of receiving same.**

Syndeo will investigate suspicious activity found by its monitoring systems or reported to Syndeo by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Syndeo contacting a subscriber to correct improper use of the platform, or, if the subscriber does not respond or comply, to block their use of the platform.

Blocking

Syndeo will implement Do Not Originate requests it receives from the ITG. Syndeo has mechanisms to automatically block suspicious calls using internal analytics. If Syndeo’s monitoring systems identify suspected robocalling patterns that are confirmed with further investigation, Syndeo will take appropriate action which may include suspending or terminating the subscriber’s use of Syndeo’s network. Syndeo will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including state attorneys general offices), to the FCC, and/or the ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. Syndeo will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, Syndeo will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

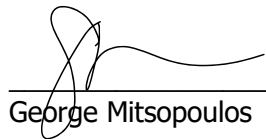
Certification of George Mitsopoulos

I, George Mitsopoulos, Chief Product Manager of Syndeo LLC ("Syndeo") do hereby certify, under penalty of perjury, the following:

- a. Syndeo has fully implemented STIR/SHAKEN in the IP portions of its network.
- b. Syndeo's business name and primary address are as follows:

Syndeo LLC
9221 Corbin Ave.
Suite 155
Northridge, CA 91324

- c. Syndeo has no other business names in use.
- d. Syndeo has not previously used any other business name.
- e. The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- f. Syndeo has one owner: Teutonic Holdings LLC, which owns 100% of Syndeo.
- g. Syndeo's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- h. Syndeo and its interest holder have not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. Syndeo and its interest holder have not subject been to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. Syndeo's Operator Code Number is 952J.



George Mitsopoulos