



Robocall Mitigation Plan

This robocall mitigation plan is for DoveTel Communications, LLC dba SyncGlobal Telecom, with headquarters at 1090 Pacific Ave, Suite A, Bremen, GA 30110.

We perform the following role in the call chain:

- A voice service provider with a STIR/SHAKEN implementation obligation serving end-users

SyncGlobal Telecom has not been prohibited from filing a certification in the Robocall Mitigation Database.

SyncGlobal Telecom does not have a history of enforcement actions for illegal robocalls, TCPA or TSR violations, or related state law violations.

SyncGlobal Telecom uses the following affirmative, effective measures to prevent the origination or transit of illegal robocalls.

Know Your Customer

We follow the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group. (<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

Our contractual provisions with customers prohibit them from initiating illegal robocalls. If we find a customer initiating suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Know Your Upstream Provider

We have a vetting and review process for upstream providers, that is, providers that send us voice traffic that we terminate or transit to other providers. We confirm that the upstream provider has a certification in the Robocall Mitigation Database. We will not accept voice traffic from an unregistered provider. We require that upstream providers have a reasonable robocall mitigation plan, including a vetting process for their customers and upstream providers, and use call analytics to identify suspicious traffic.

Our contractual provisions with upstream providers prohibit them from sending us illegal robocalls. If we find that an upstream provider is sending us suspicious robocalls, we warn them to stop. If such traffic continues, then we terminate their service.

Traceback

We respond within 24 hours to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. We cooperate fully with such entities in investigating and stopping any illegal robocallers that use our service to originate, carry, or process illegal robocalls.

Robocall Mitigation Program

We use software provided by TransNexus to monitor our outbound voice traffic in real-time to prevent the origination of illegal robocalls. The software provides detailed reporting to identify high volume, short duration calls by calling number. We immediately investigate any suspicious activity to determine if the caller was attempting to originate unlawful robocalls. If we determine that the caller was attempting to originate unlawful robocalls, then we either warn them to stop or terminate their service as appropriate.

STIR/SHAKEN

We have registered with the STI-PA using OCN 362B. We have our own STIR/SHAKEN certificate issued by the TransNexus Certification Authority (STI-CA) that we use when authenticating calls we originate. We have implemented a STIR/SHAKEN solution supplied by TransNexus.