

Symbio – Robocalling Mitigation Plan

This plan details the measures that Symbio and its affiliates have implemented to meet the requirements as published by the Federal Communications commission (FCC) for service providers to establish a “robocall mitigation plan”.

This document sets forth Symbio’s current procedures that are in place to significantly reduce the transit of illegal robocalls originating on its network.

In addition to following these steps Symbio commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service.

About Symbio

Symbio is a leading software company specialising in voice communications. Over 500 service providers – from telecom start-ups to large global software companies rely on Symbio for connectivity, quality and our expertise in providing complex communications solutions.

Headquartered in Sydney, Australia, Symbio powers billions of calls and messages each year and employs over 450 staff worldwide. Symbio has networks in four countries, Australia, New Zealand, Singapore and Malaysia.

The Symbio business was founded in 2002 and acquired TNZI (previously known as Telecom New Zealand International) in 2015. TNZI USA had long standing relationships with the Tier 1 operators in USA, with interconnection agreements dating back to 1997.

In February 2024 Symbio was acquired by Aussie Broadband Limited.

Group entities:

Aussie Broadband Limited

Symbio Holdings Limited

Symbio Global Pty Ltd

Symbio Wholesale Pty Ltd

Symbio Networks Pty Ltd

Superinternet (S) Pte Ltd

Superinternet Access Pte Ltd

Symbio Holdings Malaysia Sdn. Bhd.

Symbio Networks Malaysia Sdn. Bhd.

Tariff Expert Pty Ltd

Symbio Wholesale NZ Limited

TNZI International Pty Ltd

Symbio Networks New Zealand Limited

Symbio Networks UK Ltd

TNZI Australia Pty Limited
Symbio Networks USA LLC
Telcoinabox Operations Pty Limited
IVox Pty Ltd
Over the Wire Holdings Limited
Faktortel Holdings Pty Ltd
Netsip Pty Ltd
Over the Wire Pty Ltd
OTW Corp Pty Ltd
Telarus Pty Ltd
VPN Solutions Pty Limited
Faktortel Pty Ltd
Digital Sense Hosting Pty Ltd
Sanity Holdings Pty Ltd
Comlinx Pty Ltd
Access Digital Networks Pty Limited
Zintel Communications Pty Ltd

Stir / Shaken Implementation Status

As indicated in the FCC's Robocall Mitigation Database, Symbio's status with respect to STIR-SHAKEN implementation is as follows:

- Symbio has not implemented the STIR/SHAKEN authentication framework on any portion of its network and all calls originating on its network are subject to the procedures set out in this Robocall Mitigation Plan.
- Symbio meets the definition of a non-gateway intermediate provider as it is "any entity that carries or processes traffic that traverses or will traverse the public switched telephone network at any point insofar as that entity neither originates nor terminates that traffic" and is not a gateway provider. The following applies:
 - 47 C.F.R. § 64.6304(b) – The provider is incapable of obtaining an SPC token due to Governance Authority policy.

And are therefore exempt from the requirements of § 64.6302(d) regarding call authentication.

Customer due diligence

Symbio conducts due diligence on each new customer prior to entering into contract negotiations. This includes evaluating their credit standing and reputation using:

- Company State details including:
 - Ownership structures, Corporation or Company Registration Certificates, Government related documents, and most recently published Annual Report

- Financial Statements from the company which is party to the contract, NOT the Parent or affiliated company (audited/published versions are required where possible)
- Three Reference Check Contacts, (with at least one being known to Symbio)
- Share Market capitalisation where company is listed (if applicable)
- Credit Rating Agency report (if available)
- When a company claims that they are Subsidiary of another then by obtaining confirmation of that relationship from the Parent.

Credit Limits and Network capacity are assigned after assessment of the responses to the above.

Symbio customer contract contains provisions requiring compliance with applicable laws and regulations and acceptable use policies.

Methods used to prevent illegal traffic.

Symbio has automatic blocking in place to ensure that we do not transit any of the following:

- “Do Not Originate” blocking in place as advised or requested (as per agreed process)
- Calling and called number blocking based upon known fraudulent numbers (internal sources and i3 Fraud forum shared lists)
- Invalid called numbers where minimum number length validation rules are not met.

Symbio also monitors behaviours that show illegal, spam and robocalling activity based on several key parameters.

- Customers that generate an abnormally high number of calls within a 24-hour timeframe
- Customers that generate short duration calling within a 24-hour timeframe

Symbio has a 24*7 global operational team that investigate any traffic alerts, analyse the traffic and take action as appropriate.

Methods used to prevent illegal traffic to the U.S.

Symbio proactively blocks all calls for termination to USA that carries USA caller line identification (CLI). Only traffic from select retail sources that have been confirmed to be registered with the FCC Robocalling Database and Industry Traceback group are allowed to terminate calls via Symbio.

Traffic from those whitelisted customers are subject to the blocking and monitoring controls above.

Symbio passes through any stir shaken headers received transparently to our suppliers.

Summary and contact information

Symbio takes an active role in both domestic and international working groups that are focussed on addressing scam and spam.

Symbio commits to continue to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium. Responding to requests and applying blocking where required.

In accordance with the requirements for the FCC's Robocall Mitigation Database, Symbio provides the following information, including the name, title, department, business address, telephone number, and email address of the person responsible for addressing robocall mitigation-related issues, to include traceback inquiries from the FCC, the Traceback Consortium, and law enforcement agencies:

Contact Name: Barry Cathro

Contact Title: Network Operations Centre Manager - Global

Contact Street: Level 8, AON Centre, 1 Willis Street

Contact City: Wellington

Contact State and Zip Code: 6011. New Zealand

Contact Telephone Number: +64 27 653 8999

Contact Email: Barry.Cathro@symbio.global