

Synapse Global Corporation
ROBOCALL MITIGATION PROGRAM

Synapse Global Corporation is a small carrier and provider of a white-label telecom platform that is eligible for and are taking the STIR SHAKEN implementation extension granted to small voice service providers with fewer than 100,000 voice subscriber lines under 47 CFR § 64.6304.

Synapse Global Corporation has implemented the following Robocall Mitigation Program to detect and prevent unlawful robocalls from originating on its network. All the voice traffic that originates on Synapse Global Corporation's network is subject to the robocall mitigation program described below.

Synapse Global Corporation monitors its call detail records for patterns indicative of originating robocalls. Synapse Global Corporation LLC's switch also has the ability to generate reports identifying any detected suspicious call activity, patterns or other anomalies such as:

- Short duration calls
- Low average call duration
- Sequential dialing patterns
- Neighbor spoofing patterns
- Large bursts of calls in a short timeframe
- High-volume voice network traffic

Synapse Global Corporation will examine the reports, investigate the calls and identify the source of the originating calls as unlawful or legitimate.

Enforcement

If it is determined an Synapse Global Corporation reseller, customer, or end user ("Customer") is originating prohibited unlawful robocalls on our network, Synapse Global Corporation will either warn the Customer to stop or terminate their service as allowed per Synapse Global Corporation policy.

Traceback

Synapse Global Corporation is committed to cooperating with the Commission, law enforcement, and the registered traceback consortium in investigating and stopping any illegal robocallers that use our service to originate calls.

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>)

Synapse Global Corporation has procedures in place to prevent new and renewing Customers from using our network to originate illegal robocalls. Synapse Global Corporation thoroughly vets new business Customers by asking personally identifiable questions for additional security on each account before activating new service or making changes to existing services.

Scott Wittenberg
CEO
Synapse Global Corporation