

Syniverse Robocall Mitigation Program

Syniverse Technologies, LLC (“Syniverse”), consistent with the Commission’s rules, describes here the specific reasonable steps to avoid originating illegal robocall traffic as part of its robocall mitigation program.

I. KNOW YOUR CUSTOMERS / KNOW YOUR UPSTREAM PROVIDERS

In the context of Syniverse’s services subject to robocall mitigation regulations, Syniverse customers are exclusively US MNOs with independent robocall mitigation obligations.

Syniverse takes affirmative measures to prevent customers from using Syniverse’s network to facilitate the transmission of illegal robocalls. Among other measures, Syniverse confirms the identity of its customers. When a new customer signs up for service, Syniverse obtains the customer’s legal name, address, website address, and contact information (including phone and email address). Depending on the type of customer and nature of its business, Syniverse may request additional financial and corporate information, including but not limited to federal tax identification number, audited financial statements, business references, ownership information, and officer/director information. Syniverse verifies this identifying information in accordance with its screening and credit check program designed to identify high risk customers, maintain compliance with applicable laws, and prevent general misuse of the services. To the extent that a prospective customer’s information raises red flags, Syniverse investigates further to determine the identity of the prospective customer and examine the risk profile, including whether that prospective customer would be high-risk for generating illegal robocalls. If the prospective customer is high-risk or cannot provide Syniverse with sufficient information, Syniverse declines to accept their business.

Syniverse maintains contractual provisions designed to mitigate illegal voice traffic with its customers of services with voice components. Syniverse’s legacy contractual provisions include (i) a limitation that the services may be used by customers only as expressly authorized under the applicable agreement; and (ii) a restriction against using the relevant service for any unlawful, invasive, infringing, defamatory or fraudulent purpose. For new or renewing customers, Syniverse further requires the addition of an acceptable use policy, which sets forth specific restrictions and requirements to comply with federal laws and regulations prohibiting illegal robocalls, including a prohibition against utilizing robocalling, autodialing, predictive-dialing or other software or technologies for illegal means. Syniverse maintains the contractual right to suspend and/or terminate its services in the event of any breach of the terms of the agreement by the customer.

In the context of Syniverse’s services subject to robocall mitigation regulations, Syniverse exclusively accepts voice traffic from its contracted Public Switched Telephone Network (PSTN) partner, who is subject to independent robocall mitigation obligations. Syniverse performs screening and due diligence on all third-party service providers by collecting information about those providers, including: the physical business location, contact persons, and tax identification number. Syniverse further ensures that any PSTN partners are registered in the Robocall Mitigation Database and have sufficient technical and contractual protections in place as part of a comprehensive program to mitigate illegal robocalls.

Syniverse’s contract with its current PSTN provider addresses the obligations of the parties to comply with applicable laws and regulations, including specifically FCC regulations, related to utilization of voice services, as well as specific obligations related to fraud and robocall mitigation and requirements to cooperate with traceback requests. Such obligations include (i) managing the integrity of the traffic; (ii) managing and identifying fraudulent calling patterns; (iii) obligations to screen and block certain calls; and (iv) the identification of the source of voice calls. Syniverse’s contract with its current PSTN provider further addresses the rights of the parties to terminate illegal use of the voice services, including where the services have been used fraudulently or in contravention of applicable laws and regulations.

II. ANALYTICS

In the context of Syniverse’s services subject to robocall mitigation regulations, Syniverse relies on its PSTN provider, currently exclusively Bandwidth, Inc. (the “Provider”), to utilize call analytics systems to identify and block illegal traffic. The Provider has adopted a three-pronged operational approach (prevent, detect, and mitigate) to stop and prevent illegal robocalls, as well as aligning with the FCC guidance. The Provider has an extensive fraud mitigation team dedicated to identifying and analyzing potential robocall campaigns on its network, and determining if they are lawful or not. In alignment with the FCC rules, the Provider has further (i) implemented robocall detection technology that identifies and blocks unlawful robocalls with specific unlawful ANI/’FROM’ TN characteristics from traversing its network; (ii) uses machine learning technologies to detect voice network traffic anomalies, cost anomalies, and geographic traffic abnormalities in its fight against unlawful robocalls; and (iii) prevents its customers of voice services from utilizing problematic public URL shorteners frequently used by fraudulent bad actors in sending illegal and unsolicited telemarketing text messages.

III. TRACEBACK COMMITMENT

Syniverse commits to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to carry or process calls.

IV. SYNIVERSE PRINCIPALS, AFFILIATES, SUBSIDIARIES, AND PARENT COMPANIES LIST

Syniverse’s executive leadership can be found at:

<https://www.syniverse.com/about/leadership>.

Principles	
Name	Title
Andrew Davies	Chief Executive Officer
Bob Chiodo	Executive Vice President and Chief Revenue Officer
Justin Dellaportas	Executive Vice President and Chief Information Security and Digital Services Officer

Mark Maddy	Executive Vice President and Chief Financial Officer
William B. Petersen	Executive Vice President, Chief Legal Officer, and Secretary
Leigh Polverelli	Executive Vice President and Chief Customer and Operations Officer
Sandra Rosa	Executive Vice President and Chief Human Resources Officer
John Wick	Executive Vice President and Chief Product Officer

AFFILIATES, SUBSIDIARIES, AND PARENT COMPANIES LIST	
- Buccaneer Holdings II, LLC - Buccaneer Holdings, LLC - Cibernet Limited - Cibernet, LLC - Grupo Syniverse Technologies de Mexico S. de R.L. de C.V. - Hosted Data Solutions, LLC - PT Syniverse Technologies Indonesia - Syniverse Communication Technologies (Beijing) Ltd - Syniverse Communications, LLC - Syniverse Corporation - Syniverse Foreign Holdings Corporation - Syniverse Holdings (Mauritius) - Syniverse Holdings, LLC - Syniverse ICX, LLC - Syniverse Luxembourg Holdings 2 S.à.r.l. - Syniverse Luxembourg Holdings 4 S.à.r.l. - Syniverse Luxembourg S.C.S. - Syniverse Magellan LLC - Syniverse Messaging Holdings, LLC - Syniverse Messaging Operations S.à r.l. - Syniverse Messaging Operations, LLC - Syniverse Messaging Solutions, LLC - Syniverse Middle East FZ-LLC - Syniverse Technologies (Australia) Pty Ltd. - Syniverse Technologies (Beijing) Limited	- Syniverse Technologies (Malaysia) Sdn. Bhd. - Syniverse Technologies (Singapore) Pte. Ltd. - Syniverse Technologies Asia Pacific Limited - Syniverse Technologies B.V. - Syniverse Technologies Germany GmbH - Syniverse Technologies Holdings, LLC - Syniverse Technologies K.K. - Syniverse Technologies Korea Yuhan Hoesa - Syniverse Technologies Limited - Syniverse Technologies Limited Luxembourg S.à.r.l. - Syniverse Technologies Messaging Aps - Syniverse Technologies Mobile Solutions (Singapore) Pte. Ltd. - Syniverse Technologies Network Solutions (Singapore) Pte. Ltd. - Syniverse Technologies Network Solutions Asia Pacific Limited - Syniverse Technologies Prestação de Serviços Ltda - Syniverse Technologies S.à.r.l - Syniverse Technologies S.L. - Syniverse Technologies S.R.L. (Argentina) - Syniverse Technologies S.R.L. (Costa Rica)

- Syniverse Technologies (China) Limited - Syniverse Technologies (Financial Clearing) - Limited Syniverse Technologies (India) Private Limited	- Syniverse Technologies Services (India) Private Limited - Syniverse Technologies Solutions Limited - Syniverse Technologies Solutions Limited - Philippine Branch Office - Syniverse Technologies, LLC - Syniverse Turnkey Solutions Holding Pte. Ltd. - WP Roaming III S.à.r.l - Vibes Media, LLC - VMB LLC
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