

SNRB Labs LLC

Robocall Mitigation Plan

Pursuant to the rules of the Federal Communications Commission, including 47 CFR Section 64.6305 (Robocall Mitigation and Certification), SNRB Labs LLC has implemented the following Robocall Mitigation Program:

Preventing Illegal Traffic

SNRB Labs LLC is committed to compliance with the Telephone Customer Protection Act (TCPA), the TRACED Act (Telephone Robocall Abuse Criminal Enforcement and Deterrence) and the rules of the Federal Communications Commission pertaining to the prevention of illegal robocalling, fraudulent calling and other illegal use of its network. To that end, SNRB Labs LLC requires each customer to provide information that enables SNRB Labs LLC to “Know Its Customers” and properly conduct the necessary due diligence to comply with the law and protect its network.

Due Diligence

SNRB Labs LLC conducts due diligence with respect to each customer, both those existing prior to the date of the Robocall Mitigation Program and new customers, that is designed to ensure the customer will not originate illegal robocall traffic, or other illegal traffic, and includes:

- The proper formation and good standing of the customer entity, including whether it is foreign or domestic
- A description of the customer’s business, including whether the customer uses any auto-dialing technology
- The physical location of the customer’s business
- Obtaining the customer’s current and prior IP addresses for review, including whether they are foreign
- Determining the customer’s ownership and management and ascertaining whether there is any litigation pertaining to the customer or its principals.

Our platform is designed to prevent automated calling: we provide no API access for making calls, ensuring all calling activity occurs through our controlled user interface. This restriction helps prevent the misuse of our services for robocalling.

Traceback Requests

SNRB Labs LLC commits to responding within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls.

STIR/SHAKEN Implementation

SNRB Labs LLC has no switch and resells the hosted VoIP solution of its wholesale provider.

Such wholesale provider assigns attestation levels under the STIR/SHAKEN framework for all calls that SNRB Labs LLC originates through the wholesale provider.

Call Blocking and Analytics

SNRB Labs LLC will block services to a customer if it determines that the customer is using the services for illegal robocalling. SNRB Labs LLC uses internal traffic analysis (in our own call and message routing software) to detect and mitigate bad actors. Its wholesale provider also employs such systems. We do not use a third-party vendor for analytics.

All call and SMS logs are maintained for at least 90 days. The account and usage information are provided to law enforcement agencies when requested via a subpoena, search warrant or court order.