

Robocall Mitigation Plan – SynCells, Inc.

SynCells is a non-facilities-based small voice service provider that is committed to preventing robocall abuses. We resell services provided by VoIP and SIP Service Providers, with traffic routed across third party IP networks.

Know Your Customer

Our sales process involves an in-depth understanding of potential customers' business models and operations. This approach enables us to assess the feasibility of their involvement in any fraudulent robocalling schemes. Service provisioning is manual with small call volumes making identification of call pattern anomalies such as robocalling easy to identify.

Access to our on-premise customer end-points and PBX is secured through access control lists and various other means in accordance with industry best-practices to prevent remote users from abusing the platform.

Traceback Policy

At SynCells we uphold the highest standards of integrity and responsibility in our telecommunications services. We are dedicated to combating the scourge of illegal robocalls, and we pledge full cooperation with regulatory authorities, law enforcement agencies, and industry partners to identify and halt any misuse of our platform for such activities.

Commitment to Timely Response:

We understand the urgency of traceback requests in combating robocall fraud. Therefore, we commit to providing comprehensive responses within 24 hours to all traceback requests received from the FCC, law enforcement agencies, and industry traceback consortiums.

Dedicated Point of Contact:

For seamless communication and efficient handling of traceback requests, we have designated Gerard O'Hora as our primary contact person. Gerard can be reached at 617.380.7888 or via email at gohora@syncells.com. He is equipped to coordinate all aspects of the traceback process, ensuring swift and accurate responses.

Resource Allocation:

We recognize the importance of devoting adequate resources to facilitate prompt and thorough investigations. Therefore, SynCells is committed to allocating sufficient personnel and technology to address traceback requests promptly and provide complete information to aid in the investigation process.

Collaborative Approach:

As a responsible telecommunications provider, we work closely with our underlying service providers to trace the origin of calls made through our network. While we do not have direct access to voice calls, we will promptly engage with our upstream partners to initiate investigations in response to traceback requests.

Conclusion:

In alignment with our commitment to combating illegal robocalls, SynCells reaffirms its dedication to transparency, cooperation, and swift action in responding to traceback requests. We are steadfast in our resolve to protect consumers and uphold the integrity of the telecommunications ecosystem.

Robocall Mitigation Program

At SynCells, we prioritize the integrity of our network and the trust of our customers. To safeguard against the nuisance of robocalls, we've instituted a comprehensive Robocall Mitigation Program for all outgoing calls originating from our network.

Key features of our program include:

STIR/SHAKEN:

To the limits available to us through the hosting provider's platform, Bandwidth.com, we have implemented STIR/SHAKEN Full Attestation for outbound calls from customer locations. In addition, bandwidth.com also signs traffic from our network.

Swift Action:

Upon detecting any potential misuse of our network, we promptly initiate investigations to identify the responsible party. Our actions may range from conducting traceback investigations to verifying caller ID ownership and matching it with corporate or authorized identities.

Collaboration with Authorities:

In cases of confirmed illegal activity, we collaborate closely with law enforcement authorities, providing them with necessary information and support for swift resolution.

User Accountability:

We hold our users accountable for their actions on our network. If deemed necessary, we reserve the right to terminate services for individuals or entities found to be engaging in illegal robocalling practices.

Knowledge of Upstream Providers

All SynCells' VOIP calls are routed through our trusted network of upstream providers, comprising of Bandwidth.com as of this time. These wholesale service providers are duly registered in the FCC's Robocall Mitigation Database, ensuring their commitment to upholding regulatory standards.

Each of our upstream providers maintains connections with multiple Tier-1 service providers, all of whom adhere to FCC guidelines and possess robust mechanisms for identifying and blocking illicit robocall activity.

SynCells has received explicit assurances from our upstream providers' affirming their adherence to FCC's STIR/SHAKEN protocols and robust robocall mitigation measures. These agreements underscore our collective commitment to combating illegal robocalls and ensuring compliance with regulatory frameworks.

Furthermore, SynCells and our upstream providers have pledged to collaborate closely in mitigating unlawful robocall instances, including prompt cooperation in responding to traceback requests. Our shared dedication to maintaining the integrity of voice services underscores our proactive stance against illegal robocall activity.

Telephone Numbers

A Telephone Number (TN) serves as the caller identity in call signaling, crucial for screening purposes to identify the caller accurately. At SynCells, we ensure that each TN is uniquely associated with the subscriber, offering a reliable means of identification.

Subscribers are authorized to utilize a TN as their caller identity under the condition that the number is directly managed by SynCells or obtained through our underlying carriers. These numbers may be allocated by SynCells or ported from previous carriers, with validation conducted by our trusted carriers during the process.

For subscribers utilizing multi-line telephone systems, SynCells and our underlying provider mandate that calls are only connected if the originating number matches one of the TNs assigned to the subscriber. This stringent screening capability guarantees an automated and secure method of validating originating telephone numbers, ensuring the utmost security for our clients.

International Calling

SynCells currently doesn't offer international voice services. Should we choose to extend our services to international customers utilizing North American Numbering Plan resources in the future, we are committed to implementing thorough vetting practices. We will diligently familiarize ourselves with industry best practices and collaborate with our underlying provider to ensure comprehensive telephone number validation for all international calls.

For inquiries regarding Robocall Mitigation matters, please reach out to:

Gerard O'Hora, CEO

SynCells, Inc.

Address: 361 Newbury St, Floor 5, Boston, MA 02115

Phone: 617.380.7888

Email: gohora@syncells.com

Our commitment entails updating our Robocall Mitigation filings within 10 business days of any alterations to the information outlined in this plan. The Robocall Mitigation Plan delineates the precise measures implemented by SynCells, Inc. as of April 20, 2024. Continuously evaluating the efficacy of these measures, we remain vigilant against malicious entities and undertake necessary enhancements to our strategies.

Addendum: 2025/2026 Robocall Mitigation Plan Updates

STIR/SHAKEN Implementation SynCells, Inc. has achieved complete STIR/SHAKEN implementation for the IP-based portions of its network. We possess our own Service Provider Code (SPC) token and utilize our own digital certificate to cryptographically sign all outbound calls originating from our client PBX. This ensures caller ID authentication is applied directly by SynCells before the traffic is routed to our upstream provider, Bandwidth.com, for termination on the PSTN.

Network Topology, Call Analytics, & DNO Blocking SynCells operates strictly as a non-facilities-based provider managing on-premise PBX equipment at the customer site. We do not operate proprietary core call-routing infrastructure, nor do we operate proprietary call analytics engines or maintain an independent Do-Not-Originate (DNO) list. Instead, 100% of SynCells' outbound voice traffic is routed exclusively through our sole underlying carrier, Bandwidth.com. To comply with FCC analytics and blocking requirements, SynCells relies entirely on Bandwidth.com's network-level analytics and DNO blocking protocols to screen and mitigate suspicious traffic or invalid numbers. However we manually review customer call records regularly to identify any irregularities.

Know Your Customer (KYC) SynCells currently operates a highly restricted service footprint, presently supporting a small client test pool with no associated revenue. Because of this boutique scale, our KYC process involves direct, manual, and personal verification of the client's physical location, business model, and operational needs prior to provisioning any PBX hardware or SIP services.

Know Your Upstream Provider (KYUP) As we are dependent on Bandwidth.com for network access and network-level robocall mitigation tools, SynCells mitigates upstream risk by strictly limiting our network routing to this single, Tier-1 provider. SynCells periodically verifies that Bandwidth.com remains actively registered and in good standing within the FCC's Robocall Mitigation Database.

Regulatory Compliance History Neither SynCells, Inc., nor any of its principals, affiliates, subsidiaries, or parent companies have been subject to any Commission, law enforcement, or regulatory agency action or investigation related to illegal robocalling or spoofing within the prior two years.