



Business Information

SYNO TECHNOLOGIES LLC d.b.a
SynoLogit, Voipanion, Synokom
752 Black Horse Pk Unit 791
Pleasantville, NJ 08330

Contact Information

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Overview

In the Commission's recent release, *In the Matter of Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O"), it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that an RMP include:

- "Know your customer" procedures;
- A description of any call analytics system used to identify and block illegal traffic; and
- Whether a third-party vendor is used and, if so, the name of the vendor.

The FCC previously stated that an RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce robocalls.

Purpose

SYNO TECHNOLOGIES, LLC ("SynoLogit") is a Voice Service Provider dedicated to stopping illegal calls from originating in our network. As certified in the FCC's Robocall Mitigation Database, SynoLogit has fully implemented STIR/SHAKEN. In compliance with the R&O, SynoLogit submits this Robocall Mitigation Plan and certification.



Know Your Customer (“KYC”)

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a business relationship with SynoLogit in which we transmit, originate, and/or terminate calls on their behalf.

SynoLogit’s KYC program involves obtaining specific subscriber information when the customer establishes service. This process includes collecting information such as:

- Physical business location(s);
- Contact person(s);
- Nature of customer’s business.

Know Your Upstream Providers

In accordance with the Commission’s directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls*, SynoLogit provides the following information concerning its upstream voice carriers:

SynoLogit receives voice traffic from:

1. **Telnyx (Telnyx LLC)** – 600 Congress Avenue 14th Floor Austin, TX 78701
2. **BulkVS (Bulk Solutions, LLC)** – 333 Las Olas Way, CU1 Fort Lauderdale, FL 33301
3. **Apeiron (Apeiron, LLC)** – 100 Centurylink Drive, Mailstop 3TCW88.2, Monroe, LA 71203

According to the Robocall Mitigation Database, all these providers are STIR/SHAKEN compliant and, to the best of SynoLogit’s knowledge, they sign calls delivered to SynoLogit in accordance with FCC requirements.

Additionally, we certify that SynoLogit is partially implementing STIR/SHAKEN in our IP-based voice network and have registered with the STI-PA (iconectiv) to obtain SPC tokens. We are actively pursuing full STIR/SHAKEN compliance as we finalize our network configuration and onboarding to the Secure Telephone Identity framework.

Acceptable Use Policy (“AUP”)

SynoLogit maintains an AUP that subscribers must sign before using SynoLogit’s system(s). The AUP prohibits:



- Providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- Violating any applicable local, state, or federal law;
- Violating industry-accepted guidelines;
- Using SynoLogit's service for or in connection with fraudulent activities.

SynoLogit may suspend or terminate service for any violation of the AUP.

Telephone Number Authorization

A Telephone Number ("TN")-based caller identity is the originating number used to identify an outbound caller for screening. A subscriber is permitted to use a TN if it is managed or provisioned by SynoLogit or one of its underlying carriers.

SynoLogit tracks all TNs in its inventory system and denies the ability to use any caller ID number not assigned to the subscriber's account. If a customer requests to use an external TN, SynoLogit requires a valid letter of authorization.

Analytics for Monitoring Traffic

SynoLogit works with upstream providers to analyze high-volume traffic and identify suspicious patterns. Upon detecting potential illegal robocalls, SynoLogit will:

- Initiate a traceback investigation;
- Verify ownership or authorization of the Caller ID;
- Take enforcement action including suspending or terminating access.

SynoLogit utilizes third-party software for TN Attestation and Verification.

Investigate Suspicious Activity

Automated alerting via third-party tools triggers a response from SynoLogit's risk prevention team. The team:



- Reviews call detail records;
- Analyzes account behavior;
- Verifies system integrity;
- Contacts subscribers to confirm use cases.

SynoLogit complies with ITG standards and fully supports traceback efforts.

Blocking

SynoLogit honors Do Not Originate (DNO) requests and maintains internal procedures for blocking suspect traffic. Confirmed robocallers may be suspended or terminated. SynoLogit cooperates with law enforcement, the FCC, ITG, and state attorneys general, documenting all actions taken.

Plan Updates

This Robocall Mitigation Plan is reviewed and updated in alignment with industry best practices. SynoLogit will republish updates internally and with the FCC Robocall Mitigation Database within 10 days of material changes.

Certification of Ezequiel Sosa

I, Ezequiel Sosa, Technical Director of SYNO TECHNOLOGIES, LLC ("SynoLogit"), do hereby certify, under penalty of perjury, the following:

1. SynoLogit is in the process of fully implementing STIR/SHAKEN in the IP portions of its network.
2. SynoLogit's business name and primary address are as follows:
SYNO TECHNOLOGIES, LLC
752 Black Horse Pk Unit 791
Pleasantville, NJ 08330
3. SynoLogit has no other business names in use beyond its registered DBAs.
4. SynoLogit has not previously used any other business name.
5. The contact for robocall-related issues is listed above.

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6. SynoLogit serves as a voice service provider with a STIR/SHAKEN implementation obligation.
7. SynoLogit is not prohibited from filing in the Robocall Mitigation Database.
8. SynoLogit is not subject to any enforcement or regulatory investigation concerning unlawful robocalls or spoofing.

Ezequiel Sosa
Technical Director



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