



Robocall Mitigation Plan

Overview

Symbo is committed to preventing illegal calls from originating in our network and monitoring inbound calls in accordance with Federal Communications Commission (FCC) regulations.

STIR/SHAKEN

Symbo has fully integrated the **STIR/SHAKEN** call authentication protocol across all its networks. Additionally, we have implemented updated filters from dnc.gov on our switch platform to ensure full compliance with Do Not Call (DNC) regulations. These filters not only block numbers listed on the DNC registry but also prevent calls from known government and official numbers, minimizing unwanted communication as much as possible.

Traceback and Enforcement Cooperation

Investigating the origins of illegal calls is a crucial aspect of enforcing STIR/SHAKEN protocols and combating robocalls. Symbo is fully committed to collaborating with the traceback community, including the FCC, law enforcement agencies, and The Industry Traceback Group (ITG), to identify and halt illegal robocalls that misuse our network. Our dedicated support team is poised to promptly and thoroughly respond to traceback requests.

As of now, Symbo has not received any traceback or law enforcement inquiries suggesting that our customers are responsible for generating illegal calls. We will continue to stay vigilant to uphold the integrity of our network traffic. Symbo will comply with all relevant laws when assisting with lawful requests to address illegal calls.

Telephone Number Authorization

In this plan, a Telephone Number (TN)-based caller identity means the phone number used to identify the caller when screening calls. It's linked to a specific subscriber. This phone number, known as the TN, might or might not be directly linked to the subscriber's account with the company.



Subscribers can use a TN for caller ID if it's managed by Symbo directly or provided by one of Symbo carriers. Usually, Symbo handles the TNs used by its subscribers. Symbo keeps track of these numbers and how they're assigned in its system. When Symbo makes a call, it checks the caller's number against its records and marks the call as B.

Know Your Customer

Symbo Know Your Customer (KYC) program mandates a signed contract with subscribers. Before signing, Symbo verifies a subscriber's identity either directly or through a third-party vetting service.

The vetting process includes collecting information such as:

- ✓ Physical business location
- ✓ Contact person
- ✓ State or country of incorporation
- ✓ Federal tax ID
- ✓ Nature of the customer's business

Monitoring

Symbo has incorporated call analytics into our network to monitor voice traffic for signs of illegal robocall campaigns and fraudulent calls. Using data from our switch, we conduct extensive data analytics to detect suspicious patterns associated with robocalls. Our switches, including Peering hub and DENOVO lab, offer robust tools and reporting options for in-depth analysis. We closely monitor call flow and customer calling patterns to investigate any suspicions of illegal robocalls. This enables us to distinguish between legitimate traffic and fraudulent or unlawful activities.

Plan Update

This plan and industry standards need to evolve to effectively address the ever-changing landscape of mitigating illegal robocalling. Symbo will keep a close watch on industry best practices and consistently enhance our internal procedures. This ensures that our plan and systems remain adaptable to the ongoing challenges posed by illegal robocalling.