

ROBOCALL MITIGATION POLICY
SYO Computer Engineering Services, Inc.

I. Overview

The FCC requires that all providers certify their status in the Robocall Mitigation Database for compliance with STIR/SHAKEN.

The Commission requires voice service providers to develop a Robocall Mitigation Plan that:

- details the reasonable steps taken to avoid originating illegal robocalls
- demonstrates a commitment to respond to traceback requests to cooperate with investigating and stopping illegal robocalls
- is filed in the Robocall Mitigation Database.

This mitigation plan is submitted on behalf of SYO Computer Engineering Services, Inc. (SYO) a non-Gateway Intermediate Provider of competitive VoIP services. SYO serves communities in the state of Michigan.

SYO is a small voice service reseller of SIP services through Skye Telecom, LLC d/b/a Skyetel.

SYO partners with Skyetel to implement STIR/SHAKEN.

II. General Prohibition Against Illegal Robocalling

SYO end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service ("TOS") requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- 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; using the SYO service to engage in or in connection with fraudulent activities

SYO's end users are notified that SYO may take action up to suspension or termination of service for violation of the TOS.

III. Know Your Customer

SYO utilizes the mitigation technique of "Know Your Customer." SYO is a small long established provider that maintains a close relationship with its subscribers. Its customers are small business and local municipality users and few of its total customer base have enough call paths to generate the high volume of traffic associated with robocalling allowing us to use targeted in-house analytics to monitor, alert and apprehend suspected robocalling activities.

SYO screens new customers requesting service large volume calling capability levels:

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- We will not deploy large volume calling capability as a residential service or at an address shown in the company records as being residential
- Businesses requesting large volume calling capability must provide a tax ID and verification as to the nature of the business
- We verify addresses to look for overlapping / multiple deployed voice path subscriptions
- An SYO representative will visit the premise of the business to verify the number of users at the location is appropriate for the volume of calling

IV. Network Monitoring

SYO uses Skyetel's systems for real-time monitoring of traffic and will flag call patterns indicative of potential illegal robocalling.

V. Traceback and Enforcement Cooperation

SYO will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls. SYO will dedicate sufficient resources to provide prompt and complete responses to traceback requests.