

Robocall Mitigation Plan

The following policies apply to all customers and/or prospective customers of SignalSync LLC and comprise our Robocall Mitigation Plan to avoid originating illegal robocall traffic from our network:

1. Contract Requirement

Our agreements clearly prohibit passing illegal robocalls through any of our switches or networks and define precise requirements for ASR, LCD, and other traffic statistics. Customers who violate these rules are subject to immediate termination without notification. If SignalSync LLC believes illegal traffic has been passed through its network, the customer sending such traffic forfeits confidentiality, and all data will be shared with industry partners and law enforcement as required by regulatory bodies.

2. Customer Disclosures and Confirmation

All customers are required to disclose certain information about their business, such as physical location, contact personnel, state/country of incorporation or business formation, federal tax I.D., or non-USA government I.D. They must also disclose the practices and nature of their business. We endeavor to know the precise type of traffic that originates from each customer's switch, including the type of customers they acquire and the exact type of services they provide. SignalSync LLC investigates each customer's claims to verify accuracy before accepting them as a customer.

3. Monitoring and Traceback

SignalSync LLC diligently monitors its system and will investigate any suspicious traffic. We act promptly when we detect traffic that appears to be robocall activity to ensure it has been pre-authorized as "legal" (i.e., authorized political, non-profit, reverse 911, or fully-opted-in traffic). In the event SignalSync LLC receives a Traceback request for an illegal robocall, we act on it immediately, request a specific and detailed explanation from our customer(s), and insist on immediate corrective action. We respond promptly to all Traceback requests from authorities. If corrective action is not timely provided by our customer, SignalSync LLC takes whatever action is necessary to prevent recurrence of the event(s).

4. Publication and Notification

SignalSync LLC publishes this Robocall Mitigation Plan in the public section of its website and proactively notifies all customers of such policy, keeping a record of such notifications.

5. Foreign Sources of Traffic

SignalSync LLC has non-USA customers who service their own customers and traffic that originates from both USA and non-USA sources. We take extra precautions with non-USA customers to ensure they meet all requirements of this Robocall Mitigation Plan. Prior to authorizing a foreign customer for calling privileges, we verify all requested information.

6. Robocall Mitigation Database

No later than August 31, 2024, SignalSync LLC will require all its wholesale customers to be registered with the Robocall Mitigation Database. Those wholesale customers not registered with this database will not be allowed access to our network.

7. Call Blocking

SignalSync LLC blocks all calls originating from numbers known to us to send illegal robocall traffic and/or calls destined for specific phone numbers as appropriate for robocall mitigation.

8. Law Enforcement Cooperation

SignalSync LLC cooperates fully with investigative authorities, industry traceback groups, the FCC, and the official consortium designated to lead private traceback efforts. We have a single contact individual designated to handle all traceback requests and coordinate with outside investigations.

By implementing these measures, SignalSync LLC aims to mitigate robocall traffic effectively, ensuring compliance with regulatory requirements and maintaining a secure communication network for our customers.