



Robocall Mitigation Plan

Prepared in accordance with 47 CFR § 64.6305 and FCC DA 24-73

Voice Service Provider – Skyswitch Platform

1. Provider Overview

Zynphony Technology (“the Company”) is a Voice Service Provider that furnishes interconnected VoIP services to end-user customers through resale of services provided by upstream carrier partners utilizing the Skyswitch platform. The Company does not own or operate network infrastructure responsible for SIP signaling, call authentication, or direct interconnection with the public switched telephone network (PSTN). All call origination, transport, and PSTN interconnection functions are performed by the Company’s upstream carrier(s), which have implemented STIR/SHAKEN authentication consistent with FCC requirements.

Although the Company does not directly implement STIR/SHAKEN, it maintains and enforces a comprehensive robocall mitigation program consistent with 47 CFR § 64.6305(a).

2. Robocall Mitigation Program Measures

Zynphony Technology’s robocall mitigation program is designed to prevent, detect, and mitigate the origination of illegal robocalls and caller ID spoofing and includes the following measures:

Customer Vetting and Know-Your-Customer (KYC)

- Verification of customer identity prior to service activation
- Validation of business purpose and intended use of voice services
- Enhanced review for high-volume or outbound dialing use cases

Contractual Controls

- Service agreements prohibit illegal robocalling, caller ID spoofing, and violations of TCPA and FCC rules
- Zynphony Technology reserves the right to suspend or terminate service for violations

Traffic Monitoring and Analytics

- Monitoring of outbound calling patterns for abnormal volumes or suspicious behavior
- Coordination with upstream carriers that deploy network-level analytics and authentication tools

Response and Enforcement

- Prompt investigation of suspected illegal traffic
- Blocking, suspension, or termination of offending traffic or accounts

3. Traceback Cooperation

Zynphony Technology commits to full cooperation with traceback requests from the FCC, law enforcement agencies, and the industry traceback consortium.

- Responses provided within 24 hours of receipt
- Maintenance of accurate customer records to identify call sources
- Coordination with upstream carrier(s) to support traceback investigations

4. Coordination with Upstream Providers

Because Zynphony Technology relies on upstream carrier(s) for call origination and PSTN interconnection, robocall mitigation efforts are coordinated with those providers. Upstream carriers have implemented STIR/SHAKEN authentication and network-level robocall prevention controls. Zynphony Technology monitors upstream compliance and will take appropriate action if a provider fails to meet regulatory obligations.

5. Ongoing Compliance and Program Review

Zynphony Technology regularly reviews and updates this robocall mitigation program to ensure continued compliance with FCC regulations and evolving industry best practices. The Company remains committed to protecting consumers, preventing illegal robocalls, and cooperating fully with regulatory and enforcement authorities.