



Syntrio Solutions, LLC. Robocall Mitigation Plan

This Robocall Mitigation Plan describes the specific reasonable steps that Syntrio Solutions, LLC. ("Syntrio") has taken to avoid the origination, carrying, or processing of illegal robocall traffic on its network.

Affirmative, Effective Measures to Prevent New and Renewing Customers from Originating Illegal Calls

Syntrio has a "know-your-customer" policy through which it exercises due diligence in ensuring that our services are not being used to originate illegal traffic.

Syntrio exercises caution in granting access to high-volume origination services to ensure that bad actors do not abuse these services. Specifically, Syntrio extensively investigates potential business customers seeking access to high-volume origination services prior to providing service by collecting information such as their physical business location, contact person(s), state or country of incorporation, federal tax ID, and the general nature of their business.

In addition, Syntrio requires new and renewing business customers to sign contracts containing provisions that allow for termination in the event high-volume origination services are abused. Syntrio will not hesitate to enforce these provisions if necessary.

"Know-Your-Upstream Provider" Procedures

Syntrio exercises due diligence prior to accepting traffic from an upstream provider as it seeks to ensure that such providers are not using Syntrio to carry or process a high volume of illegal traffic. Specifically, Syntrio collects information such as the upstream provider's physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of their business.

Use of Call Analytics Systems

Syntrio uses Carrier Management Systems' NAMS Firefly solution to monitor voice traffic on its network for calling patterns consistent with illegal robocall campaigns and fraudulent calls. NAMS Firefly provides Syntrio with complete visibility in its voice network. NAMS Firefly comes with multiple interfaces, accepts multiple record formats, and offers total network visibility and data mining capabilities.

Commitment to Respond to Traceback Requests

- **Syntrio** commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls.