



Syllable Corporation Robocall Mitigation Program

Effective Date: February 20, 2026

Introduction & Purpose

Syllable Corporation ("Syllable" or "the Company") provides AI-driven voice communication services specifically for the healthcare industry. As a Voice Service Provider (VSP), Syllable is committed to preventing the origination of illegal robocalls on its network. This Robocall Mitigation Program (RMP) outlines the specific procedures, tools, and policies Syllable employs to ensure all voice traffic complies with the TRACED Act and FCC regulations.

"Know Your Customer" (KYC) Procedures

Syllable operates a closed ecosystem, serving exclusively established healthcare systems, hospitals, and medical clinics. We do not provide services to individual consumers or anonymous entities.

- **Identity Verification:** Before onboarding, Syllable verifies the legal identity of each client via Tax IDs (EIN), physical office addresses, and authorized personnel verification.
- **Direct Relationships:** Syllable maintains direct relationships with its clients; we do not allow third-party "reselling" or "sub-leasing" of our telephony resources.
- **Traffic Scoping:** We vet the nature of all automated voice traffic (e.g., patient appointment reminders, prescription notifications) prior to launch to ensure it meets the "Healthcare Message" exemption or has proper consent.

Measures To Prevent Illegal Robocalling

Syllable utilizes a multi-layered approach to prevent the origination of illegal traffic:

- **Contractual Restrictions:** Our Terms of Service strictly prohibit the use of our platform for any illegal purpose, including unauthorized telemarketing or spoofing. Violation results in immediate service termination.
- **Call Analytics & Monitoring:** Syllable utilizes automated monitoring to detect anomalies in call patterns. We monitor for high "call-attempt-to-completion" ratios and short-duration calls that may indicate fraudulent activity.
- **DNO (Do Not Originate) Lists:** Syllable ensures that calls originated from its platform do not use numbers listed on industry-standard "Do Not Originate" lists.

- **STIR/SHAKEN Integration:** Syllable works with its upstream gateway providers to ensure that all calls are digitally signed. We provide the necessary identity tokens to ensure calls reach patients with "Level A" attestation whenever technically feasible.

Cooperation With Traceback Requests

Syllable Corporation pledges full and prompt cooperation with the FCC, law enforcement, and the Industry Traceback Group (ITG).

- **24-Hour Response:** Syllable has designated a 24/7 compliance point of contact to respond to all traceback requests within 24 hours.
- **Internal Records:** We maintain detailed Call Detail Records (CDRs) that allow us to quickly identify the source and authorization of any call flagged by the ITG.

Officer Certification

I, Redgee Capili, acting as VP Engineering & Technology of Syllable Corporation, certify that I have examined this Robocall Mitigation Plan and that, to the best of my knowledge, the information contained herein is true, accurate, and complete.

Signature: 

Date: February 24, 2026