

# **Syniverse Response to Consultation Paper on The Terms and Conditions of Network Authorisations to be Granted Under the Telecommunications Act, 2023**

Consultation Paper No. 16/2024 of 22 October 2024  
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## 1 Introduction

Syniverse thanks the Telecom Regulatory Authority of India (“TRAI” or “the Authority”) for the opportunity to make known Syniverse’s comments on the Authority’s consultation paper on The Terms and Conditions of Network Authorisations to be Granted Under the Telecommunications Act, 2023 (“the Consultation Paper”) published 22.10.2024.

Our comments do not address every single issue raised by TRAI in the Consultation Paper, but we do address the salient points related to Syniverse and our role in Mobile Number Portability (“MNP”) especially but also in other key aspects. As such, in our response, if Syniverse has no opinion or comment on a consultation question we simply marked it as “No comment” following the description of the Issue for Consultation.

We look forward to continuing to collaborate with the Authority and the Telecommunication Service Providers (“TSPs”) in India for the betterment of the MNP and other key processes where Syniverse plays a part.

## 2 Issues for Consultation

2.1 Q1. Whether there is a need to merge the scopes of the extant Infrastructure Provider-I (IP-I) and Digital Connectivity Infrastructure Provider (DCIP) authorization (as recommended by TRAI in August 2023), into a single authorisation under Section 3(1)(b) of the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.

**Syniverse Response:** No comment

2.2 Q2. In case your response to the Q1 is in the affirmative, kindly provide a detailed response with justifications on - (a) Eligibility conditions for the grant of the merged authorisation; and (b) Area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the merged authorisation.

**Syniverse Response:** No comment

2.3 Q3. In case your response to the Q1 is in the negative, -  
(a) What changes (additions, deletions or modifications) are required to be incorporated in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the IP-I authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 as compared to the extant IP-I registration?  
(b) Whether there is a need to make certain changes in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the DCIP authorisation 71 (as recommended by TRAI in August 2023)? If yes, kindly provide a detailed response with justifications.

**Syniverse Response:** No comment

2.4 Q4. (a) Which telecommunication equipment/ elements should be included in the ambit of 'in-building solution' (IBS)?  
(b) Whether there is a need to introduce a new authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding in-building solution (IBS) by any property manager within the limits of a single building, compound or estate controlled, owned, or managed by it? If yes, what should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of such an authorisation? Please provide a detailed response with justifications.

**Syniverse Response:** No comment

- 2.5 Q5. Whether there is a need to make any changes in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the Content Delivery Network (CDN) authorisation, as recommended by TRAI on 18.11.2022? If yes, what changes should be made in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the CDN authorisation? Kindly provide a detailed response with justification.

**Syniverse Response:** No comment

- 2.6 Q6. Whether there is a need to make any changes in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the Internet Exchange Point (IXP) authorisation, as recommended by TRAI on 18.11.2022? If yes, what changes should be made in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the IXP authorisation? Kindly provide a detailed response with justification.

**Syniverse Response:** No comment

- 2.7 Q7. Whether there is a need to make any changes in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the Satellite Earth Station Gateway (SESG) authorisation, as recommended by TRAI on 29.11.2022? If yes, what changes should be made in the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the SESG authorisation? Kindly provide a detailed response with justification.

**Syniverse Response:** No comment

- 2.8 Q8. Whether there is a need to introduce a new authorisation for establishing, operating, maintaining or expanding satellite communication network, which may be used to provide network as a service to the entities authorised under Section 3(1)(a) of the Telecommunications Act, 2023? If yes-

(a) What should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of such authorisation?

(b) Whether an entity holding such authorisation should be made eligible for the assignment of spectrum for both feeder link as well as user link?

Kindly provide a detailed response with justification.

**Syniverse Response:** No comment

**2.9 Q9. Whether there is a need to introduce an authorisation under Section 3(1) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding ground stations, which may be used to provide ground station as a service (GSaaS)? If yes, what should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) for the authorisation to establish, operate, maintain, or expand ground stations, which may be used to provide GSaaS? Kindly provide a detailed response with justifications.**

**Syniverse Response:** No comment

**2.10 Q10. Whether there is a need to introduce an authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding cloud-hosted telecommunication networks, which may be used to provide telecommunication network as a service to the authorised entities under Section 3(1)(a) of the Telecommunications Act, 2023? If yes, what should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of such an authorisation? Kindly provide a detailed response with justifications.**

**Syniverse Response:** Syniverse believes that cloud-based operations are much more efficient and resilient, and we feel that the use of private clouds can improve resiliency while maintaining security and should be allowed in the authorisation regulatory regime. The private cloud should provide all the security - or more - as a traditional hosted model and the current MNP license conditions should apply.

**2.11 Q11. What should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of the authorisation for Mobile Number Portability Service under Section 3(1)(b) of the Telecommunications Act, 2023? Kindly provide a detailed response with justifications**

**Syniverse Response:** Yes, scope, terms and conditions as per current licensing regime should be maintained while issuing authorization or defining/re-defining service areas etc. This includes current pricing, term and other business conditions.

Section 3.6(a) of the 2023 Telecommunications Act, 2023 states that any license granted prior to the appointed day will continue to operate under the existing scope, terms, and conditions and for the duration as specified under such license. Therefore, Syniverse expects that the MNP SP scope, terms and conditions would continue unchanged until 18 March 2029. Making changes to current scope, terms and conditions unilaterally could introduce costs and obligations that were never envisaged when this license was granted.

Section 3.2 of the Telecommunications Act, 2023 allows the Central Government to provide different terms and conditions under authorisations when migrating from a license to an authorisation under sub-section 1 of section 3. However, Syniverse believes that any changes to scope, terms, and conditions of the MNP SP license would fundamentally and unfairly change the nature of the business and could have significant consequences on the existing business which would discourage investment in maintaining the quality of the service. We strongly believe that all terms and conditions for MNP should be maintained for the life of the current license.

Measures of National Security: Telecommunication Act 2023 Para 21 (d) should be extended to all managed service providers and all operational service providers to be covered under Section 3(1)(b) of the Telecommunications Act, 2023, that have access to data and telecommunication systems of authorization/license holders under Section 3(1)(a) of the Telecommunications Act, 2023, as they are integral part of India's telecommunication ecosystem.

In general, Syniverse believes stability and business continuity are of paramount importance. MNP SPs are critical to processing millions of port requests per month efficiently and effectively. The current license conditions should be replicated under any policy of authorisations to avoid sudden and dramatic shock to the systems provided. Expansions that can re-use existing organizations and environments should be considered. For example, MNP SPs could play a larger role in the proposed Calling Name Presentation ("CNAP") environment if that utilised a centralised model instead of the model currently proposed. The current model requires direct interaction among all TSPs as each needs to query the other providers in certain cases. Having this information held by the MNP SP reduces multiple interfaces to a single interface and provides a consistent user experience for subscribers receiving calls. Likewise, the current MNP SP infrastructure could also be used to provide dipping services to help defray costs for the MNP SP.

Care should be taken, in any regulatory regime change to authorisations, to ensure no conflicts of interest are created. For example, there should be clear distinction between UL holders (TSPs) (or any of its affiliates or associates or parent or subsidiary or any entity in which the TSP is the ultimate beneficial owner) and MNP SPs.

**2.12 Q12. What provisions should be included in the terms and conditions of various network authorisations under Section 3(1)(b) of the Telecommunications Act, 2023 considering the various sections including Sections 4 to 9, 19 to 24, 32 to 42, 44, 45, 49, and 55 of the Telecommunications Act, 2023 and technological/ market developments in the telecommunication sector? Kindly provide a detailed response with justifications.**

**Syniverse Response:** No comment.

**2.13 Q13. What provisions should be included in the terms and conditions of various network authorisations under Section 3(1)(b) of the Telecommunications Act, 2023 considering the policy/ Act in the Space Sector and other relevant policies/ Acts in the related sectors? Kindly provide a detailed response with justifications.**

**Syniverse Response:** No comment

**2.14 Q14. What should be the terms and conditions for the merger, demerger, acquisition, or other forms of restructuring of the entities holding network authorisations under Section 3(1)(b) of the Telecommunications Act, 2023? Please provide a detailed response with justifications in respect of each network authorization.**

**Syniverse Response:** For Mobile Number Portability Service providers Syniverse believes that authorized entities should be able to undertake normal but important corporate organizational activities as needed but should notify the Authority. In cases where a clear conflict of interest is created through the merger, acquisition, restructuring, etc. the Authority could modify the authorisation. The current MNP license terms and conditions should apply to any merged, divested, or restructured entity under the Authorisation paradigm.

**2.15 Q15. What conditions should be made applicable for the migration of existing network licenses, registrations etc. to the new network authorisation regime under Section 3(1)(b) of the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.**

**Syniverse Response:** Scope, terms, and conditions as per current licensing regime should be maintained while issuing authorization or defining/re-defining service areas etc. This includes current pricing, scope, term, and other business conditions.

Section 3.6(a) The Telecommunications Act, 2023 states that any license granted prior to the appointed day will continue to operate under the existing terms and conditions and for the duration as specified under such license. Therefore, Syniverse expects that the MNP SP Scope, terms and conditions would continue unchanged until 18 March 2029. Making changes to current scope, terms and conditions unilaterally could introduce costs and obligations that were never envisaged when this license was granted.

Section 3.2 of The Telecommunications Act, 2023 allows the Central Government to provide different terms and conditions under authorisations when migrating from a license to an authorisation under sub-section 1 of section 3. However, Syniverse believes that any changes to scope, terms, and conditions of the MNP SP license would fundamentally and unfairly change the nature of the business and could have significant consequences on the existing business which could make it difficult to continue investment in maintaining the quality of the service. We strongly believe that all scope, terms, and conditions for MNP should be maintained for the life of the current license.



Migrating a license to an authorisation, Syniverse believes that authorisations should have the same requirements as the license. Any deviations or changes should be mutually agreed upon. Current license terms and conditions should be continued

**2.16 Q16. What procedure should be followed for the migration of existing network licenses, registrations etc. to the new network authorisation regime under Section 3(1)(b) of the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.**

**Syniverse Response:** Section 3.6(a) of The Telecommunications Act, 2023 states that any license granted prior to the appointed day will continue to operate under the existing terms and conditions and for the duration as specified under such license. Therefore, Syniverse expects an Authorization be issued by the Government under Section 3.6(a) of The Telecommunications Act, 2023 to the MNP SP with same Terms, Conditions and Validity.

**2.17 Q17. Whether there is a need to introduce certain new authorisations (other than the authorisations discussed above) to establish, operate, maintain or expand telecommunication networks under Section 3(1)(b) of the Telecommunications Act, 2023? If yes, -**

**(a) For which type of telecommunication networks, new authorisations should be introduced?**

**(b) What should be the eligibility conditions, area of operation, validity period of authorisation, scope, and terms & conditions (general, technical, operational, security etc.) of such authorisations?**

**Kindly provide a detailed response with justifications.**

**Syniverse Response:** The Central Government must take extreme care to ensure that any Authorisation of additional MNP SPs do not create conflicts of interest or unfair advantages for certain parties. For example, a Unified License holder for Telecom Services Providers should not be allowed to become an MNP SP or own any interest in an MNP SP. We also note that no other country has multiple MNP SPs. In the United States of America (US) for example, mobile and fixed line providers may choose their own "Service Bureau" to interact with the Number Portability Administration Center ("NPAC") which is the comparable equivalent to a MNPSP, but there is only one NPAC in the US. Creating multiple MNP SPs within an MNP zone may introduce confusion and increase costs for the subscriber as many services would be duplicated in many MNPSPs. Instead, we advocate a single MNP SP for Pan-India. This would reflect the MNP set up in most of the rest of the world, where each country using MNP has a single master database.

The use of Authorisations as a regulatory framework should provide appropriate restrictions to ensure that subscribers and the MNP ecosystem are protected from conflicts of interest and adverse market conditions. Establishing and operating a MNPS P requires capital investment and continued investment by the current licensees to maintain the quality of service currently being provided. Changing the set-up of MNP provision in India could have a negative impact on subscribers, the users of the MNP service.

**2.18 Q18. Whether there is a need to remove certain existing authorisations to establish, operate, maintain, or expand telecommunication networks, which may have become redundant with technological advancements? If yes, kindly provide a detailed response with justifications.**

**Syniverse Response:** No Comments

**2.19 Q19. Whether there is a need to club the scopes of certain authorisations to establish, operate, maintain, or expand telecommunication networks into a single network authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 for bringing more efficiency in the telecommunication networks? If yes, kindly provide a detailed response with justifications.**

**Syniverse Response:** MNP service is unique to any other network service, MNPS P service all licensed/authorized Telecommunication providers under Section 3(1)(a) of The Telecommunications Act, 2023 with MCH porting services while managing, maintaining and securing a centralized Data base of ported mobile numbers. Since MNP Service directly results in subscriber acquisition by Telecommunication service providers leading to a market driven competition, clubbing MNP Service Authorization with any other authorization would dilute the impact of MNP itself. Hence, Syniverse believes that MNP Service Authorization should be kept independent of any other service, however, any other service that requires independent centralized Data Base (like CNAP), may be extended in scope of MNPS P Service Authorizations.

Syniverse believes stability and business continuity are of paramount importance. MNP SPs are critical to processing millions of port requests per month efficiently and effectively. The current license conditions should be replicated under any policy of authorisations to avoid sudden and dramatic shock to the systems provided. Expansions that can re-use existing organizations and environments should be considered. For example, MNP SPs could play a larger role in the proposed Calling Name Presentation ("CNAP") environment if that utilised a centralised model instead of the model currently proposed. The current model requires direct interaction among all TSPs as each needs to query the other providers in certain cases. Having this information held by the MNP SP reduces multiple interfaces to a single interface and provides a consistent user experience for subscribers receiving calls. Likewise, the current MNP SP infrastructure could also be used to provide dipping services to help defray costs for the MNP SP.

Care should be taken, in any regulatory regime change to authorisations, to ensure no conflicts of interest are created. For example, there should be clear distinction between UL holders (TSPs) (or any of its affiliates or associates or parent or subsidiary or any entity in which the TSP is the ultimate beneficial owner) and MNP SPs.

**2.20 Q20. What provisions should be included in the terms and conditions of various network authorisations under Section 3(1)(b) of the Telecommunications Act, 2023 to improve the ease of doing business? Kindly provide a detailed response with justifications.**

**Syniverse Response:** Provision to provide allied services based upon the core service being currently provided by MNPSP should be included, for example MNPDB Dipping service to authorized ILDO operators and/or enterprises, SMS aggregators, etc.

**2.21 Q21. Whether there is a need for mandating a reference agreement between authorised entities establishing, operating, maintaining or expanding the telecommunication network, and authorised entities providing telecommunication services? If yes, - (a) Between which type of entities, reference agreements are required to be mandated? (b) What should be the salient features of the reference agreements between such entities? Kindly provide a detailed response with justifications.**

**Syniverse Response:** With the license agreement the MNOs had to comply with the conditions of the MNP Regulations and use the licensees in each region at prices set by the Authority. However, there is no universal 'reference agreement' to dictate terms between the MNP SPs and MNOs. In some cases, MNP SPs have had to request intervention by the Authority for collection of past due amounts. A 'reference agreement' could help alleviate these issues going forward in the Authorisation regime. The Authority could provide a template or provide input on the key terms of any 'reference agreement.'

**2.22 Q22. Are there any other inputs or suggestions relevant to the subject? Kindly provide a detailed response with justifications.**

**Syniverse Response;** No other comments.

**2.23 Q23. In case it is decided for merging the scopes of the extant Infrastructure Provider-I (IP-I) and the Digital Connectivity Infrastructure Provider (DCIP) authorization into a single authorization under the Section 3(1)(b) of the Telecommunications Act, 2023, what should be the: - (a) Minimum equity and networth of the Authorised entity. (b) Amount of application processing fees (c) Amount of entry fees (d) Any other Fees/Charge Please support your response with proper justification.**

**Syniverse Response:** No Comment

**2.24 Q24.** In case it is decided not to merge the scopes of IP-I and DCIP, what changes/modifications are required to be made in the financial conditions of - (a) DCIP authorisation as recommended by TRAI in August 2023 (b) IP-I authorisation under the Telecommunications Act, 2023 with respect to the extant IP-I registration? Please provide a detailed response with justification.

**Syniverse Response:** No Comment

**2.25 Q25.** In case it is decided to introduce a new authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding in-building solution (IBS) by any property manager within the limits of a single building, compound or estate controlled, owned, or managed by it, then- (a) Whether there is a need to have financial conditions associated with such an authorisation? (b) In case your response to the above is in the affirmative, then what should be financial conditions for such an authorisation? Please provide detailed response with justification.

**Syniverse Response:** No Comment

**2.26 Q26.** Whether there is a need to change/ modify any of the financial conditions of the IXP and CDN authorisations from those recommended by TRAI on 18.11.2022? If yes, please provide a detailed response with justification(s).

**Syniverse Response:** No Comment

**2.27 Q27.** Whether there is a need to change/ modify any of the financial conditions of the Satellite Earth Station Gateway (SESG) authorization from those recommended by TRAI on 29.11.2022? If yes, please provide a detailed response with justification(s).

**Syniverse Response:** No Comment

**2.28 Q28.** In case it is decided to introduce a new authorisation for establishing, operating, maintaining or expanding satellite communication network under Section 3(1)(b) of the Telecommunications Act, 2023, then, what should be the financial conditions for such authorisation?

**Syniverse Response:** No Comment

**2.29 Q29.** In case it is decided to introduce an authorisation under Section 3(1) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding ground stations, which may be used to provide Ground Station as a Service (GSaaS), then: (a) Whether there is a need to have financial conditions associated with such an authorisation? (b) In case your response to the above is in the affirmative, then what should be financial conditions for such an authorisation? Please provide detailed response with justification.

**Syniverse Response:** No Comment

**2.30 Q30.** In case it is decided to introduce an authorisation under Section 3(1)(b) of the Telecommunications Act, 2023 for establishing, operating, maintaining or expanding cloud-hosted telecommunication networks, which may be used to provide telecommunication network as a service to the authorised entities under Section 3(1)(a) of the Telecommunications Act, 2023, then: (a) Whether there is a need to have financial conditions associated with such an authorisation? (b) In case your response to the above is in the affirmative, then what should be financial conditions for such an authorisation? Please provide detailed response with justification.

**Syniverse Response**

**2.31 Q31.** For Mobile Number Portability Service authorisation under Section 3(1)(b) of the Telecommunications Act, 2023, should the amount of entry fee and provisions of bank guarantees be: (a) kept same as per existing MNP license. (b) kept the same as recommended by the Authority vide its Recommendations dated 19.09.2023 (c) or some other amount/ provisions may be made for the purpose of Entry Fee and Bank Guarantees. Please support your response with proper justification.

**Syniverse Response:** To avoid the creation of an unfair and unlevel playing field, Syniverse believes that the amount of entry fee for MNP SPs should be kept the same as the existing fee for the respective license/authorisation.

The entry fee sets a minimum capital investment to help eliminate any financially unstable entities. In addition, if the entry fee is reduced it creates an equity issue as the original MNP SPs had to pay one fee and new entrants would pay a different fee.

However, new entries without the history and background should be required to have a higher bank guarantee to safeguard the porting ecosystem. Should a new entrant exit the industry the impact would be severe, so a higher entry requirement makes sense.

Further, allowing the moratorium on the 1% of AGR license fee for two years from the effective date of assurance would give an unfair advantage to any new entrant. A single entity for pan-India would be possible, but adding new ones bring additional complexity.

No entry fee should be paid by any licensee that is transferred to an authorisation. The existing licensees have already paid a fee and requiring it again would not be fair to these companies. A change in regulatory regime should not cause additional costs to be borne by the current license holders.

**2.32 Q32.** For Mobile Number Portability Service authorisation under Section 3(1)(b) of the Telecommunications Act, 2023, whether there is a need to review/ modify: (a) Definition of GR, AGR, ApGR (b) Rate of authorisation fee (c) Format of Statement of Revenue Share and License Fee (d) Norms for the preparation of annual financial statements (e) Requirement of Affidavit Please provide your response with detailed justification.

**Syniverse Response:** Syniverse believes that the preparation of annual financial statements and their review is, while a burden to the licensees, reasonable. It does provide a way for the authority to monitor the financial stability of the MNP SP licensees to ensure that the public interest is being served. The authority should consider royalties and third-party software license fees as costs and included in the financials. The royalties, even if paid to associates, are real costs that must be borne by the MNP SP. If the payments were to any other third party those costs would be considered. There are times when the submission of detailed financials may get delayed due to national holidays. Currently the Authority imposes a penalty but waives it upon request, however, allowances should be made for automatic deferment of the reporting deadlines in consideration of national holidays.

**2.33 Q33.** What financial conditions should be made applicable for the migration of the existing licensees/ registration holders to the relevant new authorisations under section 3(1) (b) of the Telecommunications Act, 2023? Kindly provide a detailed response with justifications.

**Syniverse Response:** No new financial condition be levied while migrating from existing license holder to new authorisation under section 3(1)(b) of the Telecommunication Act, 2023

**2.34 Q34.** In case it is proposed for introducing certain new authorisations to establish, operate, maintain or expand telecommunication networks under Section 3(1)(b) of the Telecommunications Act, 2023, what should be the respective financial conditions for each of such authorisation(s)? Please provide a detailed response with justifications in respect of each network authorisation, separately.

**Syniverse Response:** Financial conditions should be same as the existing licensing conditions.

**2.35 Q35.** What should be the financial conditions for the merger, demerger, acquisition, or other forms of restructuring of the entities holding network authorisations under Section 3(1)(b) of the Telecommunications Act, 2023? Please provide a detailed response with justifications in respect of each network authorisation.

**Syniverse Response:** Financial conditions should be same as of that applicable to the principal entity.

**2.36 Q36.** In case it is decided to club the scopes of certain authorisations to establish, operate, maintain or expand telecommunication networks into a single network authorisation under Section 3(1)(b) of the Telecommunications Act, 2023, then, what should be the financial conditions for such authorisations? Please provide a detailed response with justifications for each network authorisation, separately.

**Syniverse Response:** Financial conditions should be aggregated of each scope as applicable independently.

**2.37 Q37. Whether there are any other issues/ suggestions relevant to the fees and charges? The same may be submitted with proper explanation and justification.**

**Syniverse Response:** No Comments

### 3 About Syniverse

Syniverse is the world's most connected company. We seamlessly connect the world's networks, devices, and people, so the world can unlock the full power of communications.

Our secure, global technology powers the world's leading carriers, top Forbes Global 2000 companies, and billions of people, devices, and transactions every day. Our engagement platform delivers better, smarter experiences that strengthen relationships between businesses, customers, and employees.

For over 30 years, we have accelerated important advances in communications technology. Today we are an essential driver of the world's adoption of intelligent connectivity, from 5G and CPaaS to IoT and beyond. Find out more [www.syniverse.com](http://www.syniverse.com).