

Victory Telecom, Inc.
Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Victory Telecom, Inc. ("Victory Telecom") to mitigate and eliminate illegal robocalling. Victory Telecom has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Victory Telecom provides interconnected VoIP telecommunication services. Victory Telecom has fully implemented the STIR/SHAKEN authentication framework across its entire network, and all calls it originates are compliant with § 64.6301(a)(1) and (2). We presently use a 3rd party to sign our calls, but we do have our own token. Our OCN is 625J. Victory Telecom will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan.

Know Your Upstream Providers

Victory Telecom, Inc. has master service agreements with AT&T, Bandwidth, FirstComm, Connexum, and NuWave and has received written assurances from their officials that it has and will continue to sign calls submitted to Victory Telecom and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to Victory Telecom. Victory Telecom and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. Victory Telecom also requires all customers to complete a Know Your Customer document.

In our research of the prospect, Victory Telecom will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Victory Telecom's strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Victory Telecom.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Victory Telecom as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

Victory Telecom is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Victory Telecom will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Trent Bailey

CEO

tbailey@victoryc.com

Upon calling our dedicated Traceback contact, we identify the call in question immediately and use the URL provided by traceback to report our findings and notify traceback group of the customer or provider the call came from.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Victory Telecom immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number (“TN”) based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by Victory Telecom and/or obtained by Victory Telecom from Victory Telecom’s upstream providers for use by the subscriber. Numbers can also be allocated by Victory Telecom or ported using information from previous bill matching customer information.

For subscribers with multi-line telephone systems, Victory Telecom and our upstream provider only allow calls to be connected if the originating number matches one of the TN’s assigned to the subscriber. This screening capability enables an automated and secure method of validating originating telephone numbers.

International Calling

Victory Telecom is not currently an international voice services provider. If at any time Victory Telecom does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our upstream provider to perform the necessary telephone number validation on all international originated calls.

Call Analytics

We have vendors in place with filters and blocking mechanisms like SmartShield AI software for call analytics used to identify and block illegal traffic. Those vendors are Connexum and Broadnet.

Ongoing Robocall Mitigation

Victory Telecom monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we and/or our upstream provider detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities. If the Company determines that traffic is illegal, we suspend the traffic immediately and tell the customer to cease sending that traffic. Once the customer has acknowledged they will not send the traffic any longer, we allow them to resume traffic.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. By utilizing software that identifies blacklisted IP addresses and known offenders, we can block bad traffic before it reaches us. We also watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage.

Victory Telecom Contact for Robocall Mitigation-Related Issues

Please direct any questions related to Robocall Mitigation issues to:

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