

VUMBER LLC

ROBOCALL MITIGATION PLAN

Version 2

Introduction

Vumber LLC is a small voice service with less than 100,000 subscriber lines. We have completed the implementation of stir/shaken technology within our networks. We have also implemented a Robocall Mitigation Plan that quickly detects, investigates, and mitigates suspicious activity.

We have committed to responding to traceback requests and cooperating with investigating and preventing illegal robocalls.

Subscribers

We have a stringent signup policy that validates potential customers. We use third-party entities to score the details provided, preventing signup over VPN proxies and from suspicious IP addresses, email addresses, and payment methods.

Subscribers must agree to our Acceptable Use Policy. We monitor user actions on the system and will work with any subscriber to correct any unintentional minor violations or, in the case of repeated or serious violations, remove them from the system.

Security by Design

We do not provide or allow predictive dialing or bulk automated calling, and subscribers are not allowed to connect third-party systems, such as a PBX or soft switch, to our telephony systems. All calls that originate from our system must be individually dialed.

Subscribers can only originate calls using the caller ID of subscriber lines we have provisioned and allocated to them. They cannot originate calls from numbers the FCC defined as unlawful, such as unallocated numbers or numbers containing invalid numbers, digits, alpha-numeric, or indeed any number they do not own.

All our voice subscriber lines are supplied by leading US SIP carriers. Network connections to each SIP carrier are highly secure and protected by several firewall and access control lists (ACL) layers.

Call Monitoring

Our system will monitor, detect, and block any attempt by a subscriber to use a telephone number not provisioned by us and allocated to them.

We continuously run real-time call analytics, which measures the volume of calls we originate based on, for example, telephone number, user, and account. We aim to prevent any call leaving our telephony system that falls outside normal parameters or behavior consistent with illegal robocalling.

We commit to continually reevaluating our systems to ensure they match the evolving techniques bad actors use.

We endeavor to block any call terminating into our system, where the caller id number of said call is unallocated or contains invalid numbers or characters.

Tracebacks and Complaints

Vumber LLC is committed to responding to all traceback requests and cooperating with any investigation to stop illegal robocalls. We have created a dedicated email address and telephone number for trace requests, and senior-level staff is responsible for ensuring timely responses.

The FCC requires that VSPs take “reasonable and effective steps” to ensure that their immediate upstream providers are not processing high volumes of illegal traffic. We commit to following this by monitoring information made available to us by the FCC and other sources and maintaining the appropriate business and contact information for each provider.

FCC Compliance

Vumber LLC acknowledges that we are subject to FCC Stir/Shaken orders up to and including the Seventh Report and Order adopted May 18, 2023.

Updates

Vumber LLC will update its robocall mitigation plan to mitigate new and evolving methods and techniques bad actors use. This document will be updated to reflect any changes.