

Robocall Mitigation Plan
Updated as of August 20, 2025

VinaKom, Inc., d/b/a VinaKom Communications (“VinaKom”) submits this Robocall Mitigation Plan (“Plan”) pursuant to 47 C.F.R. § 64.6305. All voice traffic that is originated or terminated by VinaKom’s facilities is subject to this Plan.

VinaKom was founded in 1991 and is based out of Schaumburg, Illinois. VinaKom offers a range of telecommunications and IT services, including VoIP services, thus subjecting it to the FCC’s robocall rules. VinaKom also offers fiber optic internet services, data services and data center capabilities as well as a range of managed services products. VinaKom is a voice service provider as defined by 47 C.F.R. § 64.6300(o) and it originates and terminates calls to its customers. [BEGIN CONFIDENTIAL] [REDACTED]

[REDACTED]. [END CONFIDENTIAL].

VinaKom takes specific reasonable steps to avoid originating or processing illegal robocall traffic as part of its Plan. VinaKom believes that these practices can reasonably be expected to significantly reduce the carrying or processing of illegal robocalls. VinaKom also engages in periodic internal reviews to evaluate the effectiveness of its robocall mitigation practices, and identify and implement updates to these procedures as necessary.

STIR/SHAKEN Implementation

VinaKom has fully implemented STIR/SHAKEN pursuant to 47 CFR § 64.6301 on its network.

Know Your Customer – Policies and Contractual Provisions

VinaKom’s targeted customer base is businesses in the state of Illinois, specifically around Chicago and the Chicago suburbs, so it already has a more intimate potential customer pool.

[BEGIN CONFIDENTIAL] [REDACTED]

[END CONFIDENTIAL]. Nevertheless, VinaKom has also adopted comprehensive “Know Your Customer” (“KYC”) policies for all new and renewing customers in an effort to prevent the origination of illegal calls and in accordance with 47 C.F.R. § 64.1200(n)(4). These policies help support the company’s extensive investigation of new and returning customers, such as by requiring submission of supporting records to verify customer identity, which may include:

[BEGIN CONFIDENTIAL]

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED] [END CONFIDENTIAL];
- and

• other identifying documentation that may be appropriate for the type of customer.
Further, VinaKom is in the process of updating its contracts with customers and applicable service terms and conditions to provide additional protection by [BEGIN CONFIDENTIAL]

[END CONFIDENTIAL].

Know Your Upstream Provider – Policies and Contractual Provisions

As referenced above, VinaKom [BEGIN CONFIDENTIAL]

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
 - [REDACTED]
- [END CONFIDENTIAL].

Traffic Monitoring and Analysis; Call Blocking

VinaKom generates internal reporting to monitor voice traffic for patterns consistent with illegal robocalls. For instance, its internal analytics tools produce Score Reports based on fraud potential. VinaKom highlights and investigates high fraud scores that typically stem from high-volume or unusual traffic pattern callers. If these callers reach a certain score threshold they are blocked.

VinaKom has implemented policies and procedures to identify and block all calls and substantially similar traffic when notified by the Commission pursuant to 47 C.F.R. 64.1200(n).



REDACTED – FOR PUBLIC INSPECTION

In addition, VinaKom blocks calls that purport to originate from a number on a reasonable do-not-originate (“DNO”) list or from an invalid North American Numbering Plan number.

Traceback Commitment

VinaKom is committed to responding fully and within twenty-four (24) hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperating with the FCC, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that use VinaKom’s service to carry or process illegal calls. To assist the company in fulfilling these commitments, VinaKom has appointed specific company personnel with responsibility for timely responding to Traceback requests and has established internal procedures for producing complete and timely responses to such requests.

