

Robocall Mitigation Plan for
Global Tel*Link Corporation d/b/a ViaPath Technologies and Its Subsidiaries
(last updated April 22, 2025)

The Federal Communications Commission (“FCC”) has directed certain providers to upload a Robocall Mitigation Plan to the Robocall Mitigation Database portal that describes the specific reasonable steps the provider has taken to avoid, as applicable, the origination, carrying, or processing of illegal robocall traffic as part of its robocall mitigation plan. Specifically, the FCC requires the following to be included in robocall mitigation plans: (1) voice service providers must describe how they are meeting their existing obligation to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls; (2) non-gateway intermediate providers and voice service providers must, like gateway providers, describe any “know-your-upstream provider” procedures in place designed to mitigate illegal robocalls; and (3) all providers must describe any call analytics systems they use to identify and block illegal traffic including whether they use a third-party vendor or vendors and the name of the vendor(s). This Robocall Mitigation Plan is being filed in accordance with the above-referenced requirements.

Entities Covered by Filing

Global Tel*Link Corporation d/b/a ViaPath Technologies files this Robocall Mitigation Plan on behalf of itself and the following subsidiaries:

Public Communications Services, Inc. d/b/a ViaPath Technologies
Value-Added Communications, Inc. d/b/a ViaPath Technologies
DSI-ITI, Inc. d/b/a ViaPath Technologies
Telmate, LLC d/b/a ViaPath Technologies

These entities are collectively referred to as “ViaPath” herein. ViaPath is a “voice service provider” as defined by the FCC.¹ ViaPath is not a “gateway provider” or an “intermediate provider” as defined by the FCC.²

¹ The term “voice service” means any service that is interconnected with the public switched telephone network and that furnishes voice communications to an end user using resources from the North American Numbering Plan, including, without limitation, any service that enables real-time, two-way voice communications, including any service that requires Internet Protocol-compatible customer premises equipment and permits outbound calling, whether or not the service is one-way or two-way voice over Internet Protocol. See 47 C.F.R. § 64.6300(o).

² See 47 C.F.R. § 64.6300(d) (defining “gateway provider” as “a U.S.-based intermediate provider that receives a call directly from a foreign originating provider or foreign intermediate provider at its U.S.-based facilities before transmitting the call downstream to another U.S.-based provider”); *id.* § 64.6300(g) (defining “intermediate provider” as “any entity that carries or processes traffic that traverses or will traverse the public switched telephone network at any point insofar as that entity neither originates nor terminates that traffic”).



Extension under FCC Rule 64.6304(b)

ViaPath provides incarcerated people's communications services ("IPCS") to correctional facilities throughout the United States. Among other things, these services allow the incarcerated to initiate voice calls to their friends and families outside the correctional facility. ViaPath's voice calling services are outgoing only; the incarcerated are not permitted to receive incoming voice calls.

When receiving a voice call initiated by an incarcerated person, the called party is orally notified that the call is from a correctional facility prior to acceptance of the call, and the called party's caller ID display shows the ViaPath name and/or the ViaPath toll-free customer service number. ViaPath does not provide service to end user customers that receive caller ID information. Consumers (called parties) receiving calls initiated by incarcerated people may block the receipt of future calls by pressing a certain key when ViaPath attempts to complete the call to the consumer's telephone number, or by contacting ViaPath directly. The consumer may choose to block all calls from incarcerated people, or only specific calls.

ViaPath is subject to an extension of the STIR/SHAKEN implementation requirements under FCC Rule 64.6304(b) as a voice service provider that is "incapable of obtaining a [Service Provider Code] token due to Governance Authority policy." Under the rule, the extension remains in place until ViaPath is "capable of obtaining an [Service Provider Code] token."

Under the current Service Provider Code ("SPC") Token Access Policy issued by the Secure Telephone Identity Governance Authority in May 2021, a provider must have the following to receive an SPC token: (1) certification on file with the FCC regarding the provider's status of implementing STIR/SHAKEN or compliance with a robocall mitigation plan and a listing in the FCC's Robocall Mitigation Database; (2) an Operating Company Number ("OCN") or RespOrg ID; and (3) a current FCC Form 499-A report on file.

ViaPath is a reseller, and does not control the network infrastructure necessary to implement STIR/SHAKEN. ViaPath has contracted with underlying third-party providers to originate, transmit, and terminate calls initiated by incarcerated people, as well as obtain telephone numbers on ViaPath's behalf. As such, ViaPath has not needed to obtain an OCN, and thus does not meet the requirements to receive an SPC token under the current SPC Token Policy. ViaPath understands that its underlying third-party providers have obtained the necessary SPC token, and those providers have implemented the various STIR/SHAKEN attestation levels for voice calls initiated by incarcerated people that originate on the ViaPath IPCS system.

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Given the specialized nature of ViaPath's services, it is highly unlikely that illegal robocall traffic could be originated by incarcerated people via the ViaPath IPCS system. ViaPath has not received information suggesting that robocalls are originated by incarcerated people. Therefore, ViaPath does not consider its IPCS system or its customers at high risk of originating illegal robocalls.

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Nevertheless, ViaPath works closely with its underlying third-party providers to prevent, detect, and mitigate the delivery of illegal robocall traffic. ViaPath understands that each of its underlying third-party providers are listed in the FCC's Robocall Mitigation Database and that these providers have implemented technical and operational processes, including analytics software, to monitor call traffic on their networks. ViaPath has completed the "know-your-customer" screening process for several of its underlying third-party providers, and is subject to provisions in its contracts with its underlying third-party providers that require ViaPath to take all necessary steps to prevent illegal robocalls on the ViaPath IPCS system.

ViaPath also has implemented monitoring and reporting procedures designed to detect and prevent fraudulent traffic on its IPCS system, which would include illegal robocalls to the extent they were to occur. When illegal activity is detected on the ViaPath IPCS system, ViaPath works with its correctional facility customers to stop the unlawful activity as quickly as possible.

ViaPath has taken steps to prevent "new and renewing customers" from originating illegal robocalls. IPCS voice calls are subject to stringent safety and security measures and oversight by ViaPath and its correctional facility customers. IPCS calls are validated prior to connection, monitored, and recorded, and correctional facilities impose limits on the specific numbers that may be called by the incarcerated. These safety and security measures make it virtually impossible for the ViaPath IPCS system to be used to originate illegal robocalls.

Further, all ViaPath customers are subject to enforceable terms of use and an acceptable use policy for use of all ViaPath-provided services. These policies prohibit use of ViaPath services for any purpose other than the intended purpose, including use of ViaPath services for criminal activity or use in a manner inconsistent with applicable laws, rules, and regulations (including correctional facility policies).

ViaPath does not utilize any third-party analytics to identify and block illegal robocall traffic given IPCS is the only type of service provided by ViaPath and it is highly unlikely that illegal robocall traffic could be originated by incarcerated people via the ViaPath IPCS system. ViaPath understands that its underlying third-party providers may use third-party analytics in their networks.

Responding to Traceback Requests and Cooperation with State and Federal Regulators

ViaPath commits to respond to traceback requests and to cooperate with investigating and stopping illegal robocalls as necessary. ViaPath will respond to traceback requests received from the Industry Traceback Group, the FCC, or law enforcement within 24 hours as required under FCC rules.

ViaPath also will cooperate with state and federal regulators to prevent, detect, and mitigate illegal robocalls as applicable. Specifically, ViaPath will: (1) respond to valid law enforcement requests in a timely manner; (2) provide relevant information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and (3) implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Principals, Affiliates, Subsidiaries and Parent Companies

Please see the section titled “Entities Covered by Filing” above, which lists the FCC-regulated subsidiaries of Global Tel*Link Corporation d/b/a ViaPath Technologies.

Global Tel*Link Corporation d/b/a ViaPath Technologies is a wholly owned subsidiary of GTEL Holdings, Inc., a Delaware corporation whose principal business is telecommunications holdings. GTEL Holdings, Inc. is a wholly owned subsidiary of GTEL Acquisition Corp., a Delaware corporation whose principal business is telecommunications holdings. GTEL Acquisition Corp. is a wholly owned subsidiary of ASP GTEL Holdco, LLC, a Delaware limited liability company and holding company. ASP GTEL Investco, LP, a Delaware limited liability company and holding company, owns approximately 96% of the outstanding common equity of ASP GTEL Holdco, LLC. American Securities Partners VI, LP, a Delaware limited partnership, owns approximately 98% of ASP GTEL Investco, LP. American Securities Partners VI, LP is a private equity fund managed by American Securities LLC, an investment advisor registered with the Securities and Exchange Commission.

The following are the principals of Global Tel*Link Corporation d/b/a ViaPath Technologies:

- Paul Rossetti, Chairman of the Board
- Michael Sand, Vice President and Assistant Treasurer
- Deb Alderson, President and Chief Executive Officer
- John Pitsenberger, Chief Financial Officer and Treasurer
- Sajid Ajmeri, Vice President and Secretary
- Eric L. Schondorf, Vice President and Assistant Secretary
- Jessica Artz, Vice President and Assistant Secretary