



Vodafone US Inc.

Robocalling Mitigation Plan

Small Voice Service Provider

Version 4.0, Updated May 6, 2026



1. ABOUT THIS PLAN

Vodafone US Inc. (“VUSI”)¹ pursuant to Sections 64.6301 and 64.6305 of the Commission’s rules, 47 C.F.R. §§ [64.6301](#), [64.6305](#) and the Commission’s “Best Practices”² as amended³ adopts this Caller ID Authentication (“Plan”). This Plan is current as of its submission date and may be subject to change as necessary to further comply with amended Commission regulations and requirements.

2. VODAFONE STIR/SHAKEN IMPLEMENTATION

VUSI falls under a plain language definition of a Small Voice Service Provider serving less than 100,000 voice service subscriber lines, pursuant to Section 64.6304(a)(2) of the Commission’s rules, [47 C.F.R. § 64.6304\(a\)\(2\)](#). VUSI has obtained a Service Provider Code (“SPC”) token and engaged xConnect, a third-party verifier to implement its token and provide A-level attestation of all calls on its behalf.

VUSI maintains a STIR/SHAKEN implementation obligation directly serving end-users as set forth herein. VUSI is not a foreign voice service provider, is not a gateway provider, and does not serve end-user subscribers who are physically located outside of the U.S. VUSI has obtained an operating company number and an SPC token, however it does not have direct access to telephone numbers from the North American Numbering Plan Administrator (NANPA) and/or the National Pooling Administrator.

3. CERTIFICATION

VUSI certifies that it maintains a service provider code token and that its originating calls are being authenticated through xConnect, a third-party call verifier. VUSI has also deployed analytics applications that automatically analyze subscriber traffic for calling pattern anomalies that could be the result of robocalling subject to company investigation.

VUSI certifies that it has not been prohibited from filing in the Robocall Mitigation Database. VUSI certifies further that it has not been subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing. And VUSI certifies that at no time during the prior two years, has VUSI been the subject of a formal Commission, law

¹ Federal Registration Number [0023013378].

² *Call Authentication Trust Anchor*, WC Docket No. 17-97 *Wireline Competition Bureau Invites Comment on Caller ID Authentication Best Practices*, WC Docket No. 20-324, *Wireline Competition Bureau Issues Caller ID Authentication Best Practices*, DA 20-1526 (December 22, 2020)

³ Call Authentication Trust Anchor proceeding, WC Docket No. 17- 97, including the *Sixth Report and Order*, *Fifth Report and Order*, *Order on Reconsideration*, *Order*, FCC 22-37 (May 20, 2022) and *Call Authentication Trust Anchor*, WC Docket No. 17-97, *Sixth Report and Order*, FCC 23-18 (March 17, 2023), *Seventh Report and Order*, FCC 23-37 (May 19, 2023), and *Eighth Report and Order*, FCC 24-120 (November 22, 2024) and *Advanced Methods to Target and Eliminate Unlawful Robocalls* proceeding, CG Docket No. 17-59, *Eighth Report and Order* FCC 25-15 (February 28, 2025).



enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

4. COMMITMENT

Pursuant to Section 64.6305 of the Commission's rules, [47 C.F.R. § 64.6305](#), VUSI commits to take all such *reasonable steps* to avoid originating illegal robocall traffic and shall include a commitment to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. As set forth below, VUSI has adapted the North America Numbering Council Call Authentication Trust Anchor Working Group's *Best Practices for the Implementation of Call Authentication Frameworks*⁴ into its Plan.

5. COMPANY INFORMATION

The name, title, department, business address, telephone number, and email address of one person within the company responsible for addressing robocall mitigation-related issues and certifying compliance as VUSI's compliance officer is as follows:

Bryan Gano
Compliance Officer and Corporate Secretary
Product Risk & Compliance
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VUSI provides local, intrastate, interstate, and international telecommunications and communications service and enhanced services to commercial subscribers throughout the U.S.

VUSI is owned by Vodafone Global Enterprise Ltd., a member of the Vodafone Group of companies, which is ultimately owned by Vodafone Group Plc.

VUSI maintains operating code number 580K.

⁴ *Public Notice*, WC Docket Nos. 17-97 and 20-324, DA 20-1526, Appendix B (December 22, 2020)



6. FRAUD DETECTION AND PREVENTION CAPABILITIES

To prevent robocalling, Vodafone has implemented the following capabilities: and reasonable steps:

- **Subscriber Vetting**
 - VUSI vets all subscribers before providing service to the subscriber. VUSI obtains specific subscriber information including service locations and principals, if commercial subscribers, and verifies location for all subscribers. Further, VUSI compares information provided by the subscriber against underlying carrier records to verify accuracy and authentication and validate subscriber information. Subscribers are served under a service agreement.
 - VUSI monitors its subscribers' traffic for call, originating number and terminating number irregularities in conjunction with its underlying carriers, and should irregularities be determined, will immediately contact the subscriber as part of its investigatory process. VUSI does not grant, nor can it grant, right-to-use telephone number resources.
- **Telephone Number Validation**
 - For new subscribers, VUSI will assign telephone numbers allocated by its numbering partner to subscriber accounts, unless the account has ported service from another provider. VUSI will ensure that only those subscriber telephone numbers held by its subscribers may originate traffic. For toll-free numbers, VUSI will verify the underlying ten-digit number and ensure that only calls from the assigned numbers may originate calls. Vodafone uses Direct (in-country number range holder operators) in routing national and international calls, to minimise the potential risk of fraud.
- **Network Traffic Monitoring, Analysis and Investigation.**
 - Consistent with its commitment above, VUSI will respond fully to all traceback requests from the Commission, law enforcement, and the industry traceback consortium as soon as possible and at no time exceeding 24 hours from the time of the request and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.
 - VUSI coordinates with its underlying carriers to monitor VUSI's subscribers' traffic, identify traffic anomalies including, but not limited to, unusually high call volumes to different telephone numbers and disparate geographic areas, over the course of one or more hours, for which VUSI will investigate, and to immediately block subscriber service if robocalling is suspected. Confirmation of illegal activity and more than one violation will result in immediate service termination.
 - VUSI also leverages the intelligent Fraud Management System capability of its partner delivering services in the U.S. This helps identify and detect potential suspicious and fraudulent traffic patterns for validation and further analysis. This is



applicable on both outbound and inbound traffic with relevant traffic alerting capabilities.

- **Caller ID Authentication**

- Pursuant to Section 64.6301, Caller ID Authentication, 47 C.F.R. §§ 64.6301, VUSI will authenticate and verify caller information for calls through engagement of xConnect as a third-party verifier in conjunction with VUSI's Service Provider Code (SPC) token.
- xConnect has been engaged to authenticate calls generated over VUSI's network using VUSI's assigned SPC token. All domestic and international calls originating from VUSI's network are to be authenticated, accordingly.
- By incorporating this advanced certificate signing mechanism into its outbound call process, VUSI not only mitigates the risk of fraudulent activities such as caller ID spoofing but also establishes a reliable and secure framework for all subscribers. In so doing, VUSI fully implements the STIR/SHAKEN authentication across its entire network and calls it originates are compliant with applicable provisions of 47 C.F.R. §§ 64.6301 *et seq.*

- **Refusing Traffic from Unlisted Providers**

- In conjunction with its underlying carrier, VUSI refuses to accept traffic from unlisted and de-listed providers from the Commission's Robocall Mitigation Database.

- **Do-Not-Originate List**

- Pursuant to the Commission's *Eighth Report and Order* in its Advanced Methods to Target and Eliminate Unlawful Robocalls proceeding, VUSI is building a reasonable do-not-originate list. VUSI's do-not-originate list excludes numbers that are deemed unreasonable for purposes of call origination in accordance with the criteria established pursuant to 47 C.F.R. § 64.1200.

- **Active participation in Industry Forum**

- Vodafone is an active member of the GSMA, GLF and i3forum and adopts the best industry practice guidelines as documented and released by the working groups.

- **SIP code – "603" to reject calls due to fraud**

- Vodafone Network rejects any known fraudulent call with an industry known and agreed SIP code "603", so fraud is stopped as calls cannot be routed to other carriers.



- **Cooperation with the Commission, Industry Traceback Consortium, and Law Enforcement Agencies**

- VUSI avers to respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within twenty-four (24) hours,⁵ and to cooperate with such entities in investigating and stopping any illegal robocallers that use VUSI's service to originate calls. VUSI will coordinate with its wholesale subscribers for any traceback requests to ensure compliance.
- If following internal investigation and investigation in conjunction with the industry traceback consortium, Commission, and/or law enforcement agencies, VUSI confirms that any subscriber has engaged in – or allowed the engagement of – robocalling, VUSI will immediately terminate its provision of service as a violation of its Acceptable Use Policy, <https://smartchoiceus.com/acceptable-use-policy/> and inform the Commission and Trust Anchor of the identity of the former subscriber and telephone numbers that were involved.

VUSI anticipates that its Plan will evolve as it makes Plan enhancements, as underlying carriers enhance their own plans, and as the Trust Anchor and industry generally gain experience in caller ID authentication protocols.

VUSI avers to update its plan within ten business days from the date of any Plan changes.

May 6, 2026

Vodafone US Inc.

/s/ Bryan Ganno

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Certifying as U.S. Compliance Officer and
Corporate Secretary

⁵ Pursuant to 47 C.F.R. § 64.1200(n)(1) as clarified by the Commission.