



Vodafone Enterprise Global Ltd. Robocalling Mitigation Plan

**Non-Gateway Intermediate Foreign Service
Provider**

Version 3.0, Updated February 24, 2026



1. ABOUT THIS PLAN

Vodafone Enterprise Global Ltd. (“VEGL”) 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. VEGL STIR/SHAKEN IMPLEMENTATION

VEGL is a Foreign Voice Service Provider⁴ operating as a Non-Gateway Intermediate Provider⁵, providing service as an International Wholesale Voice Carrier engaged in trading voice minutes globally. VEGL interconnects internationally with U.S. Gateway carriers for international transport of traffic inbound into the U.S.

As a Foreign Voice Service Provider and international service provider with no U.S. network, VEGL is currently incapable of obtaining a Service Provider Code (“SPC”) token due to Governance Authority policy and is exempt from the requirements of [Section 64.6301](#) until it is capable of obtaining a SPC token as set forth in Section 64.6304(b) of the Commission’s rules, 47 C.F.R. § 64.6304(b). In accordance with VEGL must defer to its underlying carriers to authenticate calls, although VEGL has implemented specific steps to preclude robocalling, as set forth below.

VEGL is not a Gateway Provider. VEGL does not maintain, nor does it require, an operating company number and does not have direct access to telephone numbers from the North American Numbering Plan Administrator (NANPA) and/or the National Pooling Administrator.

VEGL certifies that it has not been prohibited from filing in the Robocall Mitigation Database. VEGL 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 VEGL certifies that at no time during the prior two years, has VEGL been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or

¹ FCC Form 499 Filer ID 830549

² *Best Practices for the Implementation of Call Authentication Frameworks*, NANC Call Authentication Trust Anchor Working Group (Best Practices), *See, also Call Authentication Trust Anchor*, WT 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 *Advanced Methods to Target and Eliminate Unlawful Robocalls*, *Call Authentication Trust Anchor*, CG Docket No. 17-59, WC Docket No. 17-97, *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).

⁴ 47 C.F.R. § 64.6300(c).

⁵ 47 C.F.R. § 64.6300(i).



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.

3. COMMITMENT

Pursuant to Section 64.6305 of the Commission's rules, [47 C.F.R. § 64.6305](#), VEGL 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, VEGL has adapted the North America Numbering Council Call Authentication Trust Anchor Working Group's *Best Practices for the Implementation of Call Authentication Frameworks*⁶ into its Plan.

4. COMPANY CONTACT

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 VEGL's compliance officer is as follows:

Bryan Ganno
Compliance Officer and Corporate Secretary
Product Risk & Compliance
Vodafone US Inc.
1615 Platte Street
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5. FRAUD DETECTION AND PREVENTION CAPABILITIES

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

- **Subscriber Vetting**
 - VEGL vets all subscribers before providing service to the subscriber. VEGL obtains specific subscriber information including service locations and principals, if

⁶ *Public Notice*, WC Docket Nos. 17-97 and 20-324, DA 20-1526, Appendix B (December 22, 2020)



commercial subscribers, and verifies location for all subscribers. Subscribers are served under a service agreement that authorizes immediate termination of service in the event of a subscriber's unlawful activities. VEGL does not serve U.S. subscribers.

- VEGL 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. VEGL does not grant, nor can it grant, right-to-use telephone number resources.

- **Network Traffic Monitoring, Analysis and Investigation.**

- Consistent with its commitment above, VEGL 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.
- VEGL relies upon third-party validation services of its underlying carriers, AT&T and TATA, to authenticate VEGL subscriber originated calls, monitor VEGL'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 VEGL 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.
- VEGL 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.

- **Refusing Traffic from Unlisted Providers.**

- In conjunction with its underlying carrier, VEGL refuses to accept traffic from unlisted and de-listed providers from the Commission's Robocall Mitigation Database.
- VEGL receives traffic from only known upstream carriers.

- **Active participation in Industry Forum**

- Vodafone Group, and VEGL as extension of the Group, 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**
 - VEGL 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.

VEGL 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.

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

Vodafone US, Inc.

/s/ Bryan Ganno

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Certifying as U.S. Compliance Officer and
Corporate Secretary