



VANTAGE

ROBOCALL MITIGATION PLAN

Vantage PC, Inc. (“Vantage”) is a reseller of VI Communications Services f/k/a VoIPInnovations, a division of Sangoma U.S., Inc. (RMD0002434) Hosted VoIP and does not have the capability to implement STIR/ SHAKEN. Vantage PC utilizes VI Communications for all originating and terminating calls. All originating and terminating calls (DIDs) are properly authenticated. VCommunications has fully deployed STIR/SHAKEN protocols, as well as robocall mitigation programs and policies. VoIPInnovations and Sangoma are listed under <https://authenticate.iconectiv.com/authorized-service-providers-authenticate> for being authorized providers.

Vantage is committed to combating illegal robocalls and ensuring compliance with regulatory requirements. This Robocall Mitigation Plan outlines our approach to ensure that all calls made through our systems are legitimate, consented to, and compliant with applicable laws and industry standards. This plan applies to all calls made by our organization to users regarding information on their accounts. All calls will be directed to individuals who have explicitly provided their consent to be contacted.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER (KYC)

Vantage follows the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity NANC CallerID Best Practices.

This includes confirming the identity of Vantage customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers’ businesses.

Vantage’s services are targeted to business customers. Vantage limits the number of concurrent calls that may be placed by customers and this limit would render an illicit robocalling platform from operating in a cost-effective manner.

II. CONTRACTUAL TERMS

Customers using Vantage’s services agree to abide by the rules and regulations set forth in its “Terms of Service.” Vantage’s Terms of Service expressly prohibit customers/subscribers from engaging in illegal activity, including creating a false Caller ID (i.e. spoofing).

Customers are informed that any suspicious activity will be investigated; and if the customer is engaging in, or has engaged in illegal robocalling, their service may be terminated without prior notice.



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II. TRACEBACK

Vantage commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium. In the event illegal robocallers use our system, Vantage will cooperate with such entities' investigation.

III. ROBOCALL MITIGATION PLAN

Vantage has taken the following actions to comply with the Robocall Mitigation Caller ID requirement:

Vantage has the capability to mitigate robocalls using the mitigation methods listed below.

All Phones are provisioned and maintained by Vantage PC. Preventing Customers from changing Caller ID or any other system setting, Registered IP, Caller ID associated with a DID provided by Vantage. Vantage also offers the option to set outgoing call limits on the number of simultaneous originating calls.

When Vantage PC staff identifies customer abuse of the services, including using the service for placing robocalls, Vantage takes corrective action, including termination of all voice services.

Ticketing system and 24/7 technical support to report concerns about possibly suspicious traffic.

IV. KNOW-YOUR-UPSTREAM-PROVIDER

Vantage has agreements in place with all service providers that facilitate its provision of voice services. Vantage has confirmed that each of these service providers are listed in the Robocall Mitigation Database. Vantage has taken steps to ensure that it will not accept traffic from any carrier that is removed from the Robocall Mitigation Database.

V. PLAN UPDATES

Vantage will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.

Ray Hakopian
Vantage PC Inc.
818-548-8600 Ext 110
ray@vantagepc.com