

Vocal IP Networkx Ltd

Caller ID Authentication Plan

Updated February 23, 2024

Introduction. Vocal IP Networkx Ltd (“Vocal IP”), Federal Registration Number 0016870578, 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”¹ as amended² 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.

Exemption. Vocal IP is a non-facilities-provider of Internet Protocol (“IP”) - based services exclusively to commercial subscribers in the U.S. Vocal IP 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\(a\)\(2\)](#), albeit lacks control over network infrastructure necessary to implement STIR/SHAKEN.³ Vocal IP 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).

Commitment. Pursuant to Section 64.6305 of the Commission’s rules, 47 C.F.R. § [64.6305](#), Vocal IP 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, Vocal IP 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.

¹ *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)

² *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).

³ *Call Authentication Trust Anchor*, *Implementation of TRACED Act Section 6(a)—Knowledge of Customers by Entities with Access to Numbering Resources*, WC Docket Nos. 17-97 and 20-67, *Report and Order and Further Notice of Proposed Rulemaking*, 35 FCC Rcd 3260 (Mar. 31, 2020) (First Caller ID Authentication Report and Order and Further Notice), para. 40.

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

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 is as follows:

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Chief Operations Officer/Chief Technology Officer
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Vocal IP does not operate under any assumed names. Vocal IP operates virtually exclusively as a non-facilities-based Small Voice Service Provider as defined, with a STIR/SHAKEN implementation obligation directly serving end-users as set forth herein. Vocal IP, is not an intermediate or gateway provider, does not serve subscribers who are physically located outside of the U.S., and does not act as a wholesale provider originating calls on behalf of another provider or providers. Vocal IP's operating company number is 866J. Vocal IP does not have direct access to telephone numbers from the North American Numbering Plan Administrator (NANPA) and/or the National Pooling Administrator.

Vocal IP certifies that it has not been prohibited from filing in the Robocall Mitigation Database. Vocal IP 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 Vocal IP certifies that at no time during the prior two years, has Vocal IP been the subject of a formal Commission, law 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.

Reasonable Steps to Prevent Robocalling.

Subscriber Vetting. Vocal IP verifies all existing subscriber information before providing service to the subscriber. Vocal IP obtains specific subscriber information including service locations and principals, if commercial subscribers, and verifies location for all subscribers. Further, Vocal IP submits required information to its underlying carriers who verify accuracy and authentication to validate subscriber information. Subscribers are served under a service agreement.

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

Telephone Number Validation. Vocal IP does not assign telephone numbers to subscribers. Vocal IP will ensure that only those subscriber telephone numbers held by its subscribers may originate traffic through its underlying carriers. For toll-free numbers, Vocal IP will verify the underlying ten-digit number and ensure that only calls from the assigned numbers may originate calls also through its underlying carriers.

Network Traffic Monitoring, Analysis and Investigation. Consistent with its commitment above, Vocal IP will 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.

Vocal IP will coordinate with its underlying carriers to monitor subscribers' traffic, identify traffic anomalies for which Vocal IP will investigate, and to immediately block subscriber service if robocalling is suspected. Detection of illegal activity and multiple violations will result in service termination.

Refusing Traffic from Unlisted Providers.

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

Ongoing Robocall Mitigation. Vocal IP has engaged TransNexus, <https://transnexus.com/>, as a third-party call authenticator to digitally verify calls originated from its subscribers (See <https://transnexus.com/shaken/>).

Vocal IP 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.

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

February 23, 2024

Vocal IP Networx Ltd.

/s/ Eugene Gutman

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