



Robocall Mitigation Plan: Virtual Impressions

Date: May 13, 2026

Filing Type: Voice Service Provider (Non-facilities-based)

DBAs: ISP Rock, Virtual Gurus

1. Introduction and Scope

Virtual Impressions operates as a non-facilities-based Voice Service Provider (VSP). We provide bundled VoIP services primarily to Managed Service Provider (MSP) and Internet Service Provider (ISP) clients. We do not own or operate physical switching facilities and rely on upstream provider Sinch/Vitelity for call termination and STIR/SHAKEN authentication.

2. Know Your Customer (KYC) Procedures

Virtual Impressions maintains a direct relationship with all customers and implements the following identity verification procedures:

- **Identity Verification:** We collect the legal name, physical business address, and government-issued tax ID for every new and renewing customer.
- **Service Context:** As an MSP-focused provider, we verify the intended use of the service. We do not provide services to high-volume telemarketers or auto-dialer platforms.
- **Resource Control:** We only allow outbound Caller ID for North American Numbering Plan (NANP) resources (DIDs) that we have directly provisioned to the customer through our upstream provider.

3. Network and Traffic Monitoring Virtual Impressions utilizes a secure Session Border Controller (SBC) architecture to authenticate and validate all voice traffic:

- **SBC Authentication:** All devices must authenticate through a secure, cloud-hosted SBC managed by Virtual Impressions. No unauthenticated SIP traffic is permitted onto the platform.
- **Credential Management:** SIP credentials are managed exclusively by Virtual Impressions; credentials are not shared with or available to end users to prevent unauthorized device registration.
- **Call Caps:** We impose per-DID and per-trunk rate limits to ensure that a potentially compromised device cannot be used for abnormal calling patterns or high-volume robocalling.
- **Zero Tolerance for Robocalls:** Our Terms of Service strictly prohibit the use of auto-dialers or the origination of illegal robocalls. Accounts found in violation are subject to immediate suspension.

4. Traceback Commitment and Enforcement History

- **24-Hour Traceback Response:** Virtual Impressions commits to responding to all traceback requests from the FCC, civil or criminal law enforcement, or the Industry Traceback Group (ITG) **within 24 hours of receipt.**
- **Enforcement History:** Neither Virtual Impressions nor any of its principals or affiliates have been the subject of an official FCC or law enforcement investigation related to illegal robocalling or spoofing within the last two years.

5. STIR/SHAKEN Implementation Status

Virtual Impressions is a provider without a STIR/SHAKEN implementation obligation under **47 CFR § 64.6305(a)** due to a lack of network control over the transmission facilities. We satisfy our obligations through this robust Robocall Mitigation Plan and by ensuring our upstream provider (Sinch/Vitelity) is in full compliance with STIR/SHAKEN requirements.

Reporting Robocalls

Please contact us immediately to report robocalling or any other abuse at 402-403-1000, option #8 or via email at support@virtualimpressions.com.