



Robocall Mitigation Certification

As part of Visionary Communications, LLC's submission to the Robocall Mitigation Database, pursuant to the FCC's *Sixth Caller ID Authentication Report and Order*, and applicable predecessor orders, this document describes (1) the specific reasonable steps Visionary Communications, LLC takes to avoid carrying or processing illegal robocall traffic; (2) Visionary Communications, LLC's commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium; and (3) Visionary Communications, LLC's commitment to cooperate with such entities in investigating and stopping any illegal robocallers that use the provider's service to carry or process calls. Visionary Communications, LLC, previously provided its certification document for admission into the Robocall Mitigation Database on the basis of its status as a voice service provider and submits this further updated document pursuant to the *Sixth Caller ID Authentication Report and Order*.

I. Entities Covered by Certification

The following entities are all subject to the robocall mitigation policies and procedures described in this document:

- Visionary Communications, LLC
- Skywerx Industries, LLC

Skywerx Industries LLC is a wholly owned subsidiary of Visionary Communications, LLC. For the purposes of this document, these entities are collectively referred to as "Visionary."

II. Description of Robocall Mitigation Program

A. Efforts to Avoid Carrying or Processing Illegal Robocalls

Visionary Communications, LLC ("Visionary") is a pioneering Internet Service Provider operating in Wyoming, Colorado, and Montana, offering services including Internet access via fixed-wireless and fiber solutions. Visionary is a reseller of wholesale purchased voice services. Visionary voice services are provided via multiple vendors including Inteliquent, Vitelity, Voyant, TCT, Granite, and Clearly referred to collectively as "Vendors" for the purposes of this document. All of whom have fully implemented and filed with the Robocall Mitigation Database pursuant to the *Sixth Caller ID Authentication Report and Order*.

Visionary, via its vendors, has implemented comprehensive network tools and solutions designed to mitigate illegal robocalls. These efforts include:

- **Randomizer:** Based on calling party telephone number analytics, an announcement is played to the calling party requiring entry of two randomly generated digits to complete the call. Machine-generated calls are unable to complete this step.

- **Automatic Number Identification (ANI) Management:** Originating telephone numbers are identified and blocked if they are believed to be unlawful based on repeated attempts to reach the network.
- **Proactive Blocking:** Calls from Do-Not-Originate (DNO) lists and invalid or unallocated numbers are blocked to minimize illegal traffic. Customers can also add inbound-only numbers to DNO lists.
- **No Treatment for Lawful Calls:** This treatment is applied to lawful robocalls so that they can complete. Call types eligible for this treatment include debt collections, political calls, surveys, non-profit, emergency notifications, and other lawful call types.
- **Whitelisting Valid Numbers:** Known valid numbers, such as those used by emergency services and law enforcement, are whitelisted to avoid blocking important calls.
- **Collaboration with Other Entities:** Visionary, via its vendors, works with other companies to stop unlawful robocalls. For example, Inteliquent has worked with “YouMail.” From services that YouMail provides to its own customers, YouMail creates a near real-time feed of telephone numbers being used unlawfully (typically associated with the “IRS” or similar scams). Inteliquent then monitors these numbers to take potential action. If Inteliquent recognizes that calls are being carried on its network that originates from these numbers, then DNO treatment (as described above) will be applied.
- **Contract Termination:** Visionary typically has contractual rights that allow it to terminate customers that violate relevant law, including violations of the Telephone Consumer Protection Act.

B. Traceback Requests

Visionary’s vendors of voice service are participants in the Industry Traceback Group (ITG) sponsored by USTelecom. This group collaborates across industries to trace and identify illegal robocall sources. Visionary continues to commit to responding fully and within 24 hours to traceback requests from the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium.

C. Commitment to Cooperate in Investigating and Stopping Illegal Robocallers

Visionary promptly responds to inquiries from the FCC, Federal Trade Commission (FTC), and state attorneys general, cooperating to investigate and stop illegal robocallers. This includes providing traceback information and assisting in investigations as required.

D. STIR/SHAKEN Compliance

Visionary has implemented STIR/SHAKEN on all egress traffic through its relationship with its vendors. Multiple vendors are leading advocates for STIR/SHAKEN implementation, actively promoting compliance and facilitating end-to-end call authentication, including participating in the first industry demonstration of STIR/SHAKEN functionality across multiple networks.

E. Third-Party Vendors for Call Analytics

Visionary via its vendors employs the above-mentioned network tools and third-party vendors such as Neustar and First Orion to analyze call traffic, enhancing its robocall mitigation efforts.

III. Additional Information

Operating Company Numbers (OCNs):

- Visionary Communications, LLC: 916H
- Skywerx Industries, LLC: No assigned OCN.

Information Regarding Principals and Related Entities:

Attachment A provides detailed information regarding Visionary's principals, affiliates, subsidiaries, and parent companies, including places of incorporation. None of these entities or individuals have been prohibited from filing in the Robocall Mitigation Database.

IV. Conclusion

Visionary Communications, LLC reaffirms its commitment to preventing the origination and carriage of illegal robocalls through robust mitigation practices, prompt traceback cooperation, and adherence to regulatory compliance measures such as STIR/SHAKEN implementation. Visionary will continue collaborating with industry partners and regulatory bodies to ensure the integrity of its services and protect consumers from unlawful robocalls.

Attachment A

(Visionary Communications, LLC)

