

VOCALCOM LLC

Robocall Mitigation Plan

Updated: September 2025

Introduction

VOCALCOM LLC (“VOCALCOM” or “Company” is a Cloud Contact Center that resells inbound/outbound voice line service for use within VOCALCOM’s software.

VOCALCOM does not own or control facilities within the network infrastructure that would enable it to implement the STIR/SHAKEN authentication framework. Accordingly, the Company is exempt from a STIR/SHAKEN implementation obligation. *See First Caller ID Authentication Report and Order*, 35 FCC Rcd at 3241, para. 40; 47 CFR Section 64.6304(b).

Robocall Mitigation: Measures to prevent origination of illegal robocalls

VOCALCOM has implemented the following Robocall Mitigation Plan:

Subscriber Vetting

- All customers are properly vetted and are required to enter into service agreements.
 - Business addresses and contact names are recorded and kept on file.
 - VOCALCOM remains in contact with technical and executive members of the customer’s business.
- All customers are known to VOCALCOM and have valid, established businesses.
- On average, customers are allowed 1.5 lines per individual user. Customers requesting total lines above this standard require special approval.

Contractual Prohibitions Against Illegal Robocalling

VOCALCOM end user services are subject to restrictions contained in VOCALCOM’s published legal notices. All executed services require that customers adhere to contractual requirements. VOCALCOM’s existing contracts explicitly prohibit illegal robocalling and state that services will be terminated if a customer engages in illegal robocalling.

VOCALCOM’s existing contracts also prohibit activities associated with illegal robocalling, including but not limited to:

- Providing altered, deceptive, or false information about the identity of the sender or the origin of a message or
- phone call.
- Violating any applicable local, state, or federal law.
- Using VOCALCOM’s service to engage in or in connection with fraudulent activities.
- Notifying VOCALCOM’s customers that VOCALCOM will take action for violation of the contract, including suspension or termination of service.

Telephone Number Validation

- Customers are only allowed to display numbers they own for Caller ID in the VOCALCOM software settings.
- Numbers used for Caller ID must be able to be dialed back to reach the VOCALCOM customer's business.

Ongoing Monitoring

VOCALCOM has access to customer settings that are frequently monitored to ensure Caller ID requirements are being followed. If a customer is using Caller ID that does not belong to them, VOCALCOM will notify the customer of the violation of terms of the contract and will take immediate action.

International Customers

All robocalling restrictions and monitoring procedures apply to international businesses.

Traceback and Enforcement Cooperation

VOCALCOM will actively, fully, and timely cooperate with traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) to investigate and stop illegal robocalls. VOCALCOM will dedicate sufficient resources to provide complete responses within 24 hours of a traceback request. The contact for traceback requests is:

Jamiee La Tour
j.latour@vocalcom.com
1-888-622-5266 x101

Call Analytics

As a reseller, the Company relies on its underlying providers and/or their third-party vendors to determine if originating calls should be blocked based on call analytics. The Company does not use any third-party analytics vendors.

Contact for Robocall Mitigation-Related Issues

The Company will update its Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

Jamiee La Tour
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1-888-622-5266 x101