

VDAP Robocall Mitigation Plan (Revised February 26, 2026)

1. Human-Led Business Authentication (KYC): VDAP employs a non-automated, human-driven verification process for all new business clients. We manually verify business legitimacy, including EIN/Tax ID and physical address, before granting access to our network. To maintain compliance, all accounts undergo a mandatory re-verification process every 12 months.

2. Prevention of Automated Traffic (API Restriction): To mitigate the risk of high-volume illegal robocalling and spam, VDAP does not provide public APIs for automated call or text origination. All services are restricted to manual or business-driven use cases, effectively eliminating the primary vector for automated robocall campaigns.

3. Real-Time Monitoring & STT Analysis: VDAP utilizes live Speech-to-Text (STT) transcription for call monitoring. Our system analyzes traffic in real-time to identify and stop illegal content. Additionally, our **AIM Service** proactively monitors call frequency; if a single number exceeds a reasonable per-minute threshold, the system automatically intervenes to terminate the traffic.

4. SMS/Texting Compliance & Root-Level Blocking: VDAP enforces a strict "STOP" protocol. When an end-user requests to opt-out, the texting capability is disabled at the root level. A client cannot re-enable texting to that number unless the end-user proactively reaches out to re-initiate contact, ensuring total compliance with consumer protection standards.

5. STIR/SHAKEN Implementation (Third-Party): VDAP utilizes **Bandwidth.com** for third-party call authentication. All IP-based calls originated by VDAP are passed to Bandwidth for cryptographic signing and attestation.

6. 24-Hour Traceback & DNO Commitment: In compliance with 47 CFR § 64.6305, VDAP commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) **within 24 hours**. We also utilize a reasonable **"Do Not Originate" (DNO) list** to block calls from invalid, unallocated, or non-dialable numbers.

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