



February 5, 2026

To whom it may concern,

The text below represents Velvetech Robocall Mitigation Policy.

Robocall Mitigation Policy

Overview

The policy is part of the Velvetech Compliance Policy.

The policy is implemented and followed in order to provide compliance with the TRACED act.

A voice service provider's robocall mitigation plan must "include reasonable steps to avoid originating illegal robocall traffic" and "a commitment to respond fully and in a timely manner to all traceback requests."

47 CFR §64.6305(a)(2)

A robocall mitigation program is sufficient if it includes detailed practices that can reasonably be expected to significantly reduce the origination of illegal robocalls.

Second Caller ID Authentication Report and Order FCC 20-136 para 78

General Statements

The measures Velvetech employs and plans to employ against illegal robocalls come from these two groups:

- 1) the robocalls originating prevention;
- 2) the robocalls termination prevention.

Prevent Origination options:

Know Your Customer
Industry Traceback
Contract/TOS Enforcement
Engineering - Call Policies, TNs
Reasonable Analytics

Prevent Termination options:

STIR/SHAKEN
Nuisance Calling Detection & Blocking

The Robocall Mitigation Measures

In general, illegal robocalls risk can be different according to customer type:

SIP Trunking (High Risk):

- typical Point of Entry (POE) for Robocalls;
- customer sends SIP messages from a static IP address to establish new calls;
- high rate of calls, and many concurrent calls allowed;
- often gives the ability to manipulate the outgoing caller ID;
- originating Service Provider receives calls from the customer's SIP device.

API - CPaaS Users (High Risk):

- the Next Frontier;
- innovative option that robocallers can use to generate outbound calls;
- software uses APIs to establish new calls without use of SIP.

SIP Endpoint Users - UCaaS, ATA Users, Residential Users (Low Risk)

- only 1-2 calls per endpoint are allowed;
- no ability to manipulate outbound caller ID.

Using this classification, Velvetech customers represent the third group (SIP Endpoint Users - UCaaS, ATA Users, Residential Users), with a low risk of illegal robocalls.

To prevent illegal robocalls, Velvetech uses the measures described below (as mentioned in the previous section "General Statements").

Know Your Customer (KYC)

The problem is:

- practically-anonymous parties can sign up for SIP termination and start routing calls;
- service providers who allow anonymous signup have no idea of the identity of the calling parties;
- easy for scammers to find new service and start launching calls.

FCC claims: "We require that all originating voice service providers know their customers and exercise due diligence in ensuring that their services are not used to originate illegal traffic." (FCC 20-187)

As a part of the vetting process, Velvetech collects the following information about the customer:

- physical location;
- contact person(s);
- state or country of incorporation;
- nature of the customer's business.

All the information is included in the business agreement, also explicitly prohibiting unsolicited activity including illegal robocalling, which customers have to agree with prior to gaining access to Velvetech services.

Industry Traceback Group cooperation

FCC requires Voice Service Providers to participate with traceback requests from the Industry Traceback Group.

ITG claims: "Providers do not need to proactively register with the ITG to cooperate with traceback requests and thus meet their legal obligation. Rather, providers simply need to cooperate with traceback requests they receive from the ITG, which they only will receive when a suspected illegal robocall transits that provider's network."

Velvetech is not a member of ITG, but constantly monitors incoming requests. That is, Velvetech is available to receive ITG's requests, respond to those, and eliminate the origination of the illegal calling if the origination is somehow related to Velvetech clients or infrastructure.

Contract & Terms of Service Enforcement

Velvetech Contracts and ToS explicitly forbid unsolicited activity including illegal robocalling. By using any Velvetech's Products or Services, Velvetech customers agree not to use, encourage, or allow any end-user to use Velvetech's Products and/or Services in a prohibited manner.

Engineering measures

Velvetech's upstream providers limit the calls per second capacity (CPS), so CPS value is not enough to maintain Robocalling/Autodialing. Velvetech customers inherit the limitation by transition. Velvetech also plans to implement the limiting rate at the customers' level by Q3 2022.

Velvetech fully controls the setup of clients' devices thus blocking the option for them to use unconfirmed outbound numbers without Velvetech's verification.

Reasonable Analytics

Velvetech has the analytics measures on its roadmap for inclusion into a next phase of compliance implementation. According to FCC-19-51A1, the measures ("Safe Harbor") are directed to analyze the data against the following trappings:

- large burst of calls in a short timeframe;
- invalid numbers placing a large volume of calls;
- Sequential Dialing Patterns;
- correlation of network data with data from regulators, consumers, or other carriers;
- low average call duration;
- common Caller ID Name (CNAM) values across voice service providers;
- Number Spoofing Patterns;
- comparison of Dialed Numbers to the Do Not Call Registry;
- low call completion rates;
- large volume of complaints related to a suspect line;
- patterns that indicate TCPA or other contract violations.

STIR/SHAKEN

Velvetech has implemented the STIR/SHAKEN measures across Velvetech infrastructure. The measures imply that outgoing calls are digitally signed to confirm their Caller ID is genuine, and guarantee that Velvetech clients receive calls of genuine origin as well.

Nuisance Calling Detection & Blocking

Velvetech also plans to implement the measures that give Velvetech clients the ability to know if the incoming call is likely to be unwanted or suspicious. The option is related to "Reasonable Analytics" from the section above. This measure is currently on Velvetech's roadmap for inclusion into a next phase of implementation.

Best,

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