

**Voitex LLC dba Teleground**  
**Robocall Mitigation Plan**

## **Introduction**

This document details the reasonable steps and actions taken by Voitex LLC dba Teleground (“Voitex”) to mitigate and eliminate illegal robocalling. Voitex has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity.

Voitex provides Voice over Internet Protocol (“VoIP”) calling services. Voitex has fully implemented the STIR/SHAKEN authentication framework across our entire network, and all calls we originate are compliant with § 64.6301(a)(1) and (2). Voitex has our own token and OCN (724K).

## **Know Your Underlying Provider**

Through Voitex’s Terms and Conditions, we mandate that each agreement with our upstream providers incorporates strict policies pertaining to fraudulent calls. Our upstream providers agree to abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services. Voitex and its provider partners have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

## **Know Your Customer**

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. All our clients will receive a human call within the first few days following their signup to discuss their needs and ensure that our services are not misused. Each of our clients is clearly informed at the time of signup that they must comply with all federal and state regulations regarding the calls they are making.

In our research of the prospect, Voitex will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to Voitex’s strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with Voitex.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by Voitex as a customer and any existing customer relationships could potentially be severed.

## **Traceback Requests**

Voitex is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. Voitex will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Joel Gancz

President

[joel@voitex.com](mailto:joel@voitex.com)

845.951.1000

Upon calling our Traceback Contact, an initial ticket is opened with Network Operations. This request is then routed to the switch operator. We will then identify if calls apply to originating DID rules and extract the logs in question.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, Voitex immediately begins rejecting all traffic from the offending customer.

## **Telephone Numbers**

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if they complete a LOA form to allow us to submit a port request to the previous provider to allow the previous provider to allow the number to port over to our platform.

## **International Calling**

Voitex is not currently an international voice services provider. If at any time Voitex does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and work with our underlying provider to perform the necessary telephone number validation on all international originated calls.

## **Call Analytics**

We use Martini Security to validate the certificate and to validate inbound traffic. If inbound traffic is deemed invalid, it will block the inbound traffic.

## **Ongoing Robocall Mitigation**

Voitex uses the platform Martini Security as our STIR/SHAKEN Certificate provider and this platform will validate any legitimate traffic. The softswitch platform's back-end monitors STIR/SHAKEN certificate validity. Voitex also monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; block the party's ability to originate, terminate, or route calls on the network; and/or providing notice to law enforcement authorities. If we determine that traffic is illegal, we take the following action:

- First offense the customer receives a verbal warning.
- Second offense the customer has service shut off until they call to have service reinstated and receive a second warning that if this happens again services will be terminated with no warning.
- Third offense services are shut off permanently.

## **Voitex Contact for Robocall Mitigation-Related Issues**

The Company will update our 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:

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Monroe, NY 10950  
845.951.1000  
[joel@voitex.com](mailto:joel@voitex.com)