



Robocall Mitigation Plan

1. Company Information

- **Legal Business Name:** VPC-IT, Corp (“VPC-IT”)
- **Doing Business As:** qnectU
- **FRN (FCC Registration Number):** 0026570366
- **Primary Robocall-Mitigation Contact:**
 - Name: Gregory E. Mauer
 - Title: President
 - Phone: 801-948-9850
 - Email: fcc@vpcit.com
- **Principals, Affiliates, Subsidiaries, and Parent Companies:** VPC-IT operates as an independent provider with no affiliates or subsidiaries.

2. Commitment to Compliance

- As certified in the Robocall Mitigation Database (“RMD”), VPC-IT has complete SIR/SHAKEN implementation and certifies that all of the calls that it originates on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a), which includes reasonable steps to avoid originating and processing illegal robocall traffic and includes a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate.

3. Mitigation Practices in Place

- **Know Your Customer (“KYC”) / Customer Vetting:**
 - VPC-IT has implemented KYC procedures used when onboarding new or renewing customers to ensure that such customers and providers do not or are not likely to engage in any prohibited conduct. When signing up new end user customers that will receive its VoIP services, VPC-IT appropriately collects information about a subscriber to determine that subscriber’s “identity and operational legitimacy.” For instance, as part of the vetting process, VPC-IT generally requires its customers to provide the full legal name of the company, state or country of incorporation, the physical address of its operations, the billing name and address (when different), and the customer contact name and telephone number, nature of the customer’s business, among other things. Doing so is necessary to provide a prompt response to traceback requests and enforcement efforts.
 - VPC-IT refuses to provide service to customers who cannot demonstrate a legitimate need for outbound calling.
 - VPC-IT applies affirmative measures to prevent new and renewing customers from originating illegal robocalls, including express contractual prohibitions,

verification of call-use cases, and ongoing monitoring. In addition, VPC-IT's Acceptable Use Policy ("AUP") discussed in Section 5, below, allows VPC-IT to terminate a customer's service if the AUP is violated.

- **Traffic Monitoring & Analytics:**

- VPC-IT flags and investigate abnormal spikes in short-duration or high-volume calls.
- VPC-IT terminates or suspend accounts generating suspicious traffic.
- VPC-IT reviews call analytics to detect patterns associated with unlawful robocalls.
- VPC-IT does not use a third-party analytics vendor.

- **Know Your Upstream Providers:**

- VPC-IT maintains "know-your-upstream-providers" procedures, validating that our interconnection partners are themselves listed in the FCC's RMD and adhere to FCC mitigation requirements.

- **Cooperation with Enforcement:**

- VPC-IT commits to respond fully and in good faith to traceback requests within 24 hours.
- VPC-IT cooperates with FCC, law enforcement, and the Industry Traceback Group ("ITG") in all investigations.

- **Ongoing Monitoring & Training:**

- VPC-IT reviews mitigation effectiveness quarterly.
- VPC-IT trains staff on detection and reporting of unlawful robocall activity.

4. Business Identity & Enforcement Disclosure

- **Role in Call Chain:** VPC-IT functions as an originating and terminating voice service provider.

5. Acceptable Use Policy ("AUP") Provision

- VPC-IT's customers are subject to its Master Service Agreement ("MSA") and an AUP. This AUP includes provisions that prohibit customers from using VPC-IT's services in a manner that violates any applicable law. And permits VPC-IT to suspend or terminate services if any such violation occurs. The AUP specifically states, "PROVIDER MAY SUSPEND OR TERMINATE THE SERVICES IN ACCORDANCE WITH THE AGREEMENT IF ANYONE IN YOUR ORGANIZATION VIOLATES THIS AUP."

6. Commitment to Continuous Improvement and Updates

- VPC-IT is committed to enhancing its robocall mitigation practices in line with FCC requirements and industry best practices.
- If there are any changes to VPC-IT's robocall mitigation certification or this Robocall Mitigation Plan, VPC-IT will update its filings in the RMD within 10 business days.