

Robocall Mitigation Program (RMP)

Date Submitted: 12/17/2024

FCC Registration Number (FRN): 0031327372

Company Overview

Vivant is a small managed service aggregator that combines services from multiple underlying providers to deliver seamless solutions for small businesses. As a responsible service provider, Vivant is committed to preventing Caller ID spoofing and ensuring the authenticity of all outbound traffic originating from our network. We fully support the FCC's efforts to eliminate illegal robocalling and have implemented comprehensive measures to safeguard our platform against abuse.

Commitment to Robocall Mitigation

Vivant is fully committed to prevent unlawful use of its voice network for unauthorized robocalls and has proactively implemented the following measures to prevent Caller ID spoofing, robocallers and autodialers within its control and ensure call authenticity for every call.

Implementation of STIR/SHAKEN

1. Know Your Customer (KYC) Process:

-
- | Protocol | Percentage |
|----------|------------|
| HTTP | 35% |
| HTTPS | 30% |
| FTP | 10% |
| SMTP | 10% |
| POP3 | 5% |
| IMAP | 5% |
| Telnet | 2% |
| SSH | 2% |
| DNS | 1% |
- Figure 1: Distribution of traffic by protocol. The chart shows that HTTP and HTTPS are the most common protocols, accounting for 35% and 30% of the traffic respectively. Other protocols like FTP, SMTP, POP3, IMAP, Telnet, SSH, and DNS account for smaller percentages of the total traffic.

- [REDACTED]

2. **Outbound Call Controls:**

- [REDACTED]

3. **Traceback Compliance:**

- Vivant responds within 24 hours to all traceback requests from the FCC, law enforcement agencies, and the registered traceback consortium.
- We fully cooperate with such entities to investigate and terminate any illegal robocall activity involving our services.

4. **Caller ID Validation:**

- [REDACTED]

5. **Customer Vetting and System Limitations:**

- Vivant enforces strict onboarding procedures to validate customer identities and intended use cases for voice services.
- Automated outbound dialing is not supported nor available in Vivant's system.
- Our Terms of Service explicitly prohibit the use of phones for automated or illegal dialing purposes.

6. **Call Analytics and Monitoring:**

- [REDACTED]

7. Upstream Provider Verification:

- [REDACTED]

Compliance and Reporting

Vivant does a regular audit of our network and customer traffic to ensure compliance with the FCC's robocall mitigation requirements.

Vivant certifies that it has not, at any time in the past, been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing relating to claims of transmitting, encouraging, assisting or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.

Vivant also certifies that it has not been prohibited by the Commission from filing in the Robocall Mitigation Database and that none of its prior certifications submitted in the Robocall Mitigation Database have been removed by Commission action.

[REDACTED]