



Voipography Robocall Mitigation Program – 2026

1. Program Objective

Voipography is committed to preventing the origination, transmission, and facilitation of illegal robocalls across its telecommunications network.

Our 2026 Robocall Mitigation Program is designed to:

- Prevent illegal robocall traffic from entering or exiting our network
- Ensure full compliance with FCC regulations and traceback obligations
- Protect downstream carriers and end-users
- Maintain network integrity and industry trust
- Strengthen customer onboarding and traffic oversight controls

Voipography maintains a **zero-tolerance policy** toward illegal robocalling, spoofing, traffic pumping, and unlawful automated calling activity.

2. STIR/SHAKEN Call Authentication

Voipography has implemented **STIR/SHAKEN** across its IP-based voice infrastructure.

Implementation Overview:

- All eligible outbound calls are signed using STIR/SHAKEN protocols.
- Attestation levels (A, B, or C) are assigned based on customer identity verification and number ownership validation.
- Certificate management and private key handling follow industry best practices.
- Calls that cannot be verified are assigned lower attestation or blocked when appropriate.

Attestation Policy:

- **Full (A) Attestation** is granted only when Voipography has verified the customer's identity and confirmed their right to use the telephone numbers.
 - Attestation levels may be downgraded or revoked if suspicious traffic is detected.
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3. Caller ID Policy & Number Whitelisting Controls (NEW – 2026 Strengthening)

Voipography does **not allow customers to freely generate or spoof arbitrary Caller IDs.**

Caller ID Controls:

- Customers are prohibited from using Caller IDs that they do not legally own or have documented authorization to use.
- All outbound Caller IDs must be:
 - Assigned directly by Voipography **OR**
 - Submitted for verification and approved (whitelisted) prior to use.

Whitelisting Process:

Before a customer can use an external Caller ID:

1. Proof of number ownership or authorization is required.
2. Documentation is verified by compliance staff.
3. The number is added to Voipography's internal **Caller ID Whitelist Database.**
4. Only whitelisted numbers are permitted for outbound origination.

Enforcement:

- Any attempt to transmit unauthorized Caller IDs results in immediate blocking.
- Repeated violations result in suspension or termination.
- Spoofing behavior triggers compliance investigation.

This strict Caller ID control policy significantly reduces spoofing risk and strengthens STIR/SHAKEN attestation integrity.

4. Planned AI-Based Traffic Monitoring (2026 Development Initiative)

Voipography is currently planning the implementation of an advanced AI-driven traffic monitoring system during 2026.

Planned Capabilities:

The upcoming system is intended to:

- Detect high-volume short-duration calling patterns
- Identify sequential or neighbor spoofing behavior
- Flag abnormal answer-seizure ratios
- Monitor rapid traffic ramp-ups
- Assign automated customer risk scores
- Generate real-time compliance alerts

Current Status:

At present, Voipography utilizes:

- Manual traffic review processes
- Threshold-based traffic alerts
- Call Detail Record (CDR) analysis
- Complaint-based investigation procedures

The AI-based monitoring system is part of our 2026 network integrity enhancement roadmap and will further strengthen proactive robocall detection capabilities.

5. Enhanced Know Your Customer (KYC) Program

Voipography maintains a comprehensive customer verification and onboarding framework.

KYC Objectives:

- Verify identity before enabling origination privileges
 - Assess risk level of new customers
 - Assign appropriate STIR/SHAKEN attestation level
 - Prevent bad actors from entering the network
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Information Collected During Onboarding:

Business Customers:

- Legal business name
- Business registration documentation
- EIN / Tax ID
- Physical address verification
- Responsible officer details
- Intended use case declaration
- Expected traffic profile

Individual Customers:

- Government-issued identification
 - Address verification
 - Contact validation
 - Risk assessment review
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Enhanced 2026 Controls:

- Higher scrutiny for high-volume dialer customers
 - Mandatory business use-case disclosure
 - Compliance certification regarding TCPA adherence
 - Periodic re-verification for active customers
 - Traffic pattern comparison against declared business activity
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6. Call Blocking & Filtering Mechanisms

Voipography implements layered protection measures:

- Invalid/unallocated number blocking
- Do-Not-Originate (DNO) list enforcement
- Known scam number filtering
- Unauthorized Caller ID blocking
- Suspicious traffic threshold blocking

Traffic inconsistent with declared customer activity is subject to immediate review.

7. Traceback Cooperation Policy

Voipography fully cooperates with industry traceback efforts and regulatory authorities.

We:

- Respond promptly to traceback requests
- Preserve call detail records
- Investigate flagged traffic immediately
- Suspend or terminate confirmed violators

Confirmed illegal robocall activity results in immediate service termination.

8. Legal & Regulatory Compliance

Voipography complies with:

- Telephone Consumer Protection Act (TCPA)
- Truth in Caller ID Act
- FCC Robocall Mitigation Orders
- STIR/SHAKEN implementation mandates
- FCC Robocall Mitigation Database requirements

We maintain documented procedures supporting compliance and enforcement.

9. Cross-Functional Oversight

Robocall mitigation oversight includes:

- Engineering & Network Operations
- Compliance & Legal
- Customer Support
- Risk Management

Periodic reviews are conducted to evaluate traffic trends and enforcement actions.

10. Continuous Improvement Commitment

Voipography remains committed to:

- Strengthening KYC controls
 - Enhancing Caller ID validation
 - Implementing AI-driven detection tools in 2026
 - Actively cooperating with industry anti-robocall initiatives
 - Maintaining zero tolerance for illegal robocall activity
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Executive Certification

Voipography affirms that it has implemented effective robocall mitigation practices and strict customer verification procedures to prevent the origination and transmission of illegal robocalls and spoofed traffic.

We remain committed to continuous improvement, regulatory compliance, and protection of the telecommunications ecosystem.

Authorized Officer Signature

Company Name: Voipography Inc.

Authorized Officer Name: Hasan Razzaq

Title: CEO

Date: February 28th, 2026

Email Address: hasan@voipography.com

Signature:

Hasan