

VISTITUDE COMPUTER SOLUTIONS, INC.

ROBOCALL MITIGATION PLAN

Vistitude Computer Solutions, Inc. ("VCS") is a non-facilities-based voice service provider.

VCS maintains a robocall mitigation program reasonably designed to prevent the origination of illegal robocalls in accordance with 47 CFR § 64.6305.

STIR/SHAKEN Implementation

VCS ensures that all outbound calls are signed using STIR/SHAKEN call authentication through authorized upstream carrier partners.

VCS validates that customers may only originate calls using telephone numbers assigned to them and does not permit unauthorized caller ID spoofing.

Know Your Customer Procedures

Prior to activating voice services, VCS implements commercially reasonable procedures to verify customer identity and legitimacy.

VCS collects and verifies business name, address, and contact information, and confirms that customers are operating legitimate businesses consistent with the services requested.

Acceptable Use and Enforcement

All customers agree to a written Acceptable Use Policy that prohibits:

- Illegal or fraudulent calling practices
- Violation of the Telephone Consumer Protection Act
- Transmission of misleading or inaccurate caller ID information
- Unlawful telemarketing or robocalling

VCS reserves the right to suspend or terminate services for violations.

Traffic Monitoring and Mitigation

VCS monitors outbound traffic for patterns indicative of illegal robocalling or spoofing.

If suspicious traffic is identified, VCS promptly investigates and takes appropriate action, including suspension or termination of service when warranted.

Traceback and Cooperation

VCS commits to respond fully within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Consortium.

VCS cooperates with regulators and industry partners in investigating and stopping illegal robocallers.

Certification

VCS certifies that:

- All outbound calls are signed using STIR/SHAKEN
- VCS maintains a robocall mitigation program reasonably designed to prevent illegal robocalls
- VCS complies with applicable FCC requirements