

Emmix Inc. Robocall Mitigation Program Description

Sept 1, 2025] [Vibrant Voice Company's FCC Registration Number 0031507783

This document details the comprehensive Robocall Mitigation Program implemented by Emmix Inc. to prevent the origination, transit, and termination of illegal robocall traffic on our network. This program is in full compliance with the Federal Communications Commission's (FCC) regulations, including 47 C.F.R. § 64.6305.

1. General Mitigation and Traceback Commitment

Emmix Inc. is deeply committed to combating illegal and unwanted robocalls. Our multifaceted program is designed to take proactive, reasonable steps to protect consumers and the integrity of the U.S. telecommunications network. We commit to responding fully and within **24 hours** to all traceback requests from the FCC, law enforcement, and the industry traceback consortium. We will provide all necessary information to assist in the swift identification and prosecution of illegal robocallers.

2. Customer Vetting and "Know Your Customer" (KYC) Procedures

As a voice service provider, Emmix Inc. understands the critical importance of vetting our customers to prevent illegal activity from originating on our network. Our rigorous KYC process for all new and renewing customers includes:

- **Information Collection:** We require all customers to provide comprehensive business information, including their full legal name, physical business address, federal tax ID or corporate registration documents, and the name and contact information of a primary business and technical contact.
- **Due Diligence:** The provided information is cross-referenced with public records and third-party data services to verify accuracy and legitimacy. We conduct an initial risk assessment to identify any inconsistencies, past regulatory issues, or other red flags.
- **Business Intent Review:** We require a detailed description of the customer's intended use of our services, including the nature of their business and the type of call traffic they anticipate. This allows us to ensure their traffic patterns are consistent with a legitimate business purpose.
- **Contractual Controls:** Our service agreements explicitly prohibit the use of our services for illegal robocalling, caller ID spoofing, or any fraudulent activity. The

contract includes provisions for the immediate suspension or termination of services for any customer found to be in violation.

3. Call Analytics and Traffic Monitoring

Emmix Inc. employs a robust, real-time analytics system to proactively monitor and identify suspicious call traffic patterns.

- **System Description:** We utilize a third-party analytics platform, to analyze all inbound and outbound call traffic.
- **Detection Criteria:** Our system continuously monitors for anomalous call patterns indicative of illegal robocalling, including:
 - Unexplained spikes in call volume.
 - High rates of short-duration calls (e.g., calls lasting less than 10 seconds).
 - Low average call completion rates.
 - Sequential or rapid-fire calling to unassigned or non-existent numbers.
- **Automated Action:** Our system is configured to automatically block or flag high-risk traffic, preventing it from reaching its destination. The system assigns a reputation score to traffic, and any calls that exceed a specific threshold are immediately mitigated.
- **Manual Review:** All flagged traffic is immediately escalated to our dedicated compliance team for a manual review and investigation. We contact customers in real-time to address suspicious traffic and require them to provide a valid business justification.

4. Traceback and Enforcement Procedures

Upon receiving a traceback request, Emmix Inc. follows a strict protocol to ensure a full and timely response.

- **Designated Contact:** Traceback requests are routed to our designated robocall mitigation contact, whose information is filed with the FCC. This individual is responsible for ensuring all requests are handled in a timely manner.
- **Data Retrieval:** Our internal systems are designed to retrieve all relevant call detail records, customer information, and any associated traffic analysis data needed to complete the traceback request.

- **Swift Cooperation:** We will actively cooperate with the requesting agency to identify the source of the illegal calls and take appropriate action against the responsible party, including immediate service suspension or termination.

By adhering to this comprehensive program, Emmix Inc. is committed to upholding its regulatory responsibilities and contributing to a safer and more trustworthy telecommunications ecosystem for all.