

Robocall Mitigation Plan

VOCALCOLA, LLC

Overview

VocalCola is a dynamic call tracking service based in the US. allowing multiple numbers to ring to the same line so text and call source statistics, recordings, and transcriptions can be gathered. VocalCola is committed to providing its services in accordance with all legal and regulatory requirements, and works with its carrier to ensure the FCC's requirements for Voice Service Providers are met. VocalCola is a small "pure reseller" VSP that has no control over the infrastructure necessary to implement STIR/SHAKEN, so it relies on, and works closely with, its upstream Carrier to assist in robocall mitigation.

Reasonable Steps to Prevent New and Existing Customers from Originating Illegal Calls:

VocalCola Customers must accept and comply with the Acceptable Use Policy ("AUP") outlined in our [Terms of Use](#) which requires the Customer not to misuse the VocalCola platform or violate any local, state, or federal laws, or regulations. Customers that violate our AUP may have their service suspended or closed.

Description of Analytics to Block Illegal Traffic:

Prevention

Each account created is reviewed for suspicious criteria. While every account must verify an email address with us, those deemed suspicious are required to contact us directly to have their account manually activated by verifying additional details including but not limited to:

- Business Address
- Business Phone Number
- Industry
- Website if applicable

Monitoring

All accounts have usage parameters based on anticipated traffic. These parameters allow us to identify potential misuse based on observed fraudulent usage patterns. Pending investigation, accounts may be suspended or closed.

Remediation

Customers violating our terms of service are sometimes eligible for a one-time remediation plan. This requires a recommitment to our terms of service, acknowledgment of wrongdoing, and submission of a detailed plan for avoiding further violations. When a remediation plan is in place, any concurrent violations of our terms of service result in account closure. An account can be locked automatically by misuse, but can only be unlocked after review by VocalCola staff.

Know Your Customer Practices:

VocalCola collects more identifying information for each account during the billing process. This information includes the individual's name, business name, and mailing address.

Know Your Upstream Provider Practices:

VocalCola utilizes Bandwidth's call filtering, blocking, and analytics services to detect and prevent robocalls and call spoofing.

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Commitment to Respond to Traceback Requests:

VocalCola is willing and able 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 calls.

This Robocall Mitigation Plan officially describes the specific measures that VocalCola has implemented as of December 16th, 2024. VocalCola continually evaluates the efficacy of its measures to combat bad actors and takes appropriate steps to improve these measures when needed.