

Caracas, April 26, 2024

Federal Communications Commission
Robocall Mitigation Database Team
Competition Policy Division
Wireline Competition Bureau

STIR/SHAKEN IMPLEMENTATION AND ROBOCALL MITIGATION PLAN (RMP)

VENINFOTEL COMUNICACIONES (VITCOM), C.A. ("VITCOM"), a foreign voice service provider, submits this filing for the Commission's Robocall Mitigation Database established pursuant to the Second Report and Order in the *Call Authentication Trust Anchor* proceeding.¹ This filing describes VITCOM's policies and procedures to prevent and mitigate illegal robocalls using North American Numbering Plan (NANP) numbers that pertain to the United States. VITCOM reserves the right to modify, add, delete or otherwise alter any of the policies and procedures described herein, at any time as it deems appropriate to reflect its business, capabilities and needs.

Company Background

VITCOM is a Venezuelan company, duly licensed to provide local, domestic and international long distance voice services in Venezuela. VITCOM does not allow its subscribers to use nor does it plan to allow its subscribers to use North American Numbering Plan (NANP) numbers that pertain to the United States of America to send voice traffic to residential and business subscribers in the United States.

STIR/SHAKEN Implementation

As a foreign service provider, VITCOM is not subject to 47 C.F.R. § 64.6301, *et seq.*, including the requirement in § 64.6301(a) to implement the STIR/SHAKEN call authentication framework. VITCOM has not implemented STIR/SHAKEN for its calls. However, due to the nature of its services and its relations with carriers worldwide that send voice traffic for completion, VITCOM is not a significant source of illegal robocalls destined to the United States. Even though VITCOM does not have the faculty to assign nor use NANP numbering to its subscribers it has implemented a robocall mitigation plan as described below.

ROBOCALL MITIGATION PLAN

¹ *Call Authentication Trust Anchor*, WC Dockets Nos. 17-97, Second Report and Order FCC 20-136 (rel. Oct. 2020)



This Robocall Mitigation Plan describes the specific measures that VITCOM has implemented to detect and prevent illegal robocalls on its network as of June 30, 2021. The measures described below explain how VITCOM mitigates and addresses the risk that it will originate or act as an intermediate carrier for illegal robocall traffic. VITCOM periodically evaluates the risks it faces, the effectiveness of its policies and procedures, and its capabilities to support the measures described herein. Should it determine that changes are appropriate and required, its practices may vary from those described as follows:

MEASURES TO PREVENT OR AVOID EXCHANGING ILLEGAL ROBOCALLS

- **Policy Know your Customer.** VITCOM designed and enforces its Know your Customer policy whereby performs identity validations on new and renewed customers and if it is a business customer, keeps records of the incorporation documents, tax id certificates and other legal documents as it deems appropriate.
- **Network Monitoring.** VITCOM monitors its network for fraudulent or suspicious traffic, including traffic that may be associated with illegal robocalling activity. In the event potential fraud is detected, VITCOM will take action to mitigate the potential fraud, including temporary or permanent blocking of traffic and efforts to identify the source of the traffic.
- VITCOM blocks traffic from invalid NANP numbers by default. VITCOM will also block traffic that appears to be illegal or is flagged as suspicious under its fraud policy. VITCOM will take appropriate action with its customer upon identification of suspicious patterns of calls, including unusual volumes, and has the authority to suspend or terminate service if necessary.

Responding to Traceback Requests

- VITCOM commits to responding, to the extent permitted under applicable law, with valid traceback requests from the Commission, law enforcement agencies or the Industry Traceback Group (ITG).

Cooperation with State and Federal Regulators

VITCOM will cooperate to the extent permitted under applicable law, and to the best of its abilities, with valid requests from the Commission, or law enforcement agencies to identify and stop any illegal robocallers that use VITCOM's services to originate call. Specifically, consistent with applicable law, VITCOM will:

- Respond to valid law enforcement requests;



- Provide relevant non-proprietary information in response to reasonable and legitimate requests about illegal robocalls and suspicious activities; and
- Implement mandated robocall mitigation procedures to the fullest extent possible with the goal of maximizing the mitigation of illegal robocalls.

Please do not hesitate to contact us in the event you require further information.

Sincerely yours,

OSCAR A. SANTANDER
VP Telephony & Interconnection
VENINFOTEL COMUNICACIONES (VITCOM), C.A.
FRN 0031511843

