



VirtueCom, Inc.
Robocall Mitigation Certification and Plan

This Robocall Mitigation Plan is submitted by VirtueCom, Inc. (VirtueCom) pursuant to the provisions of § 64.6305 of the Federal Communications Commission's (FCC) rules, which require all voice service providers to establish a robocall mitigation plan. VirtueCom provides voice services using 3CX for call management with Bandwidth.com as our wholesale voice provider.

STIR-SHAKEN IMPLEMENTATION STATUS

VirtueCom, Inc. is a voice provider without a STIR/SHAKEN implementation obligation. The Company lacks control over the network infrastructure necessary to implement STIR/SHAKEN. See *First Caller ID Authentication Report and Order*, 35 FCC Rcd 3241, para. 40; 47 CFR Section 64.6304(b).

Our underlying voice provider, Bandwidth.com (Bandwidth), has certified complete STIR/SHAKEN implementation.

ENFORCEMENT

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan.

On August 25, 2025The FCC's Wireline Competition Bureau and Enforcement Bureau found that VirtueCom was out of compliance with the FCC's RMD rules and removed VirtueCom's Robocall Mitigation Database certification on August 27, 2025.

VirtueCom and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing.

TRACEBACK

VirtueCom commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. VirtueCom will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our service to carry, process, or originate robocalls.



IDENTIFYING INFORMATION

- Business name(s): VirtueCom, Inc
- Primary address of the provider: 44 Inverness Dr E, Suite C; Englewood, CO 80112
- Other business names in use by the provider:
- All business names previously used by the provider: N/A
- VirtueCom is not a foreign voice service provider.
- OCN: N/A
- Principal: Onami Bernheim, CEO
- Robocall Mitigation Issues Contact

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I, Onami Bernheim, for VirtueCom, Inc. submit this certification on behalf of VirtueCom, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury, that the information and statements contained herein are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read 'Onami Bernheim', written over a horizontal line.

Signature

A handwritten date '8/29/25' in black ink, written over a horizontal line.

Date



Robocall Mitigation Plan

VirtueCom views these policies and procedures as constituting reasonable steps to avoid the origination of illegal robocalls on our network. All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan.

As a reseller, VirtueCom relies on Bandwidth's call analytics to monitor call traffic.

In its RMD filing, Bandwidth states that it:

- has a team of operational experts who have implemented technical and operational processes and procedures to monitor, detect and analyze the use of its services and traffic on our network that helps to determine when illegal and inappropriate robocalling activity may be occurring;
- has developed and deployed a "Call Blocking Tool" that incorporates industry best practices into its core network to identify and block invalid, unallocated and otherwise obviously illegal telephone numbers;
- follows established processes and procedures to notify upstream customers of the problematic traffic and request that they take immediate corrective actions to prevent recurrence of the illegal calls;
- consistently analyzes its call detail records to identify problematic call patterns and their sources.

Additionally, VirtueCom has procedures in place to confirm the calling customer's right to use a telephone number. VirtueCom's customers are permitted to use a telephone number as their caller identity if a number is directly managed by VirtueCom and/or obtained by VirtueCom via an underlying partner. Further, for: (1) single line voice service subscribers, both services connected via TDM or IP, the switching equipment has been set up to only accept calls from the number assigned to that subscriber; and (2) subscribers with multi-line telephone systems, for both services connected via TDM or IP, VirtueCom screens all originating calls and only allows calls to be connected if the originating number matches one of the numbers assigned to the subscriber.

Know-Your-Customer Processes

VirtueCom will use best practices in vetting the identity of all of its voice service subscribers. The subscriber vetting process is intended to help determine the legitimacy of a customer for the purpose of establishing a service relationship. Generally, VirtueCom looks to confirm the identity of customers by collecting information such as physical customer location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business. VirtueCom vets subscribers during the process of provisioning customer requested services (for example in appropriately sizing the facilities to their claimed intended use), executing VirtueCom's required service agreements, and granting the customer the right to use telephone



resources. Certain users, such as larger businesses with more complex service configurations, are generally recognized as presenting a higher risk of perpetrating illegal robocalls. Such customers, at VirtueCom's discretion, may be subject to an additional review, including a more stringent background check and a site visit.

VirtueCom:

- Utilizes service agreements and acceptable use policies as a means of preventing its new and existing subscribers from using their voice and broadband services in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity. These documents governing use of VirtueCom provided services include terms indicating specifically to all customers that their services should not be used for the purpose of making illegal robocalls, and VirtueCom reserves the right within its service agreements to suspend or terminate a subscriber's voice service for violating applicable service-related terms.
- Has established a process of routinely monitoring the usage and quality of its network facilities and conducts recurring and timely reviews of its call detail records (CDRs) to facilitate early identification of unusual or suspicious calling activity or patterns that may indicate use of the network for originating illegal robocalls. In those instances where VirtueCom identifies activity or a pattern consistent with illegal robocalls, the customer will be contacted within twenty-four hours for further investigation and possible action regarding their subscribed voice service.

Know-Your-Upstream Providers

VirtueCom relies on Bandwidth's Know-Your-Upstream Provider processes.

Traceback

VirtueCom will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use our network to originate robocalls.