

Voipwell, LLC

Caller ID Authentication and Robocall Mitigation Plan

Updated February 18, 2026

Introduction.

Voipwell, LLC pursuant to Sections 64.6301, 64.6305, and 64.6306 of the Commission's rules, 47 C.F.R. §§ 64.6301, 64.6305, 64.6306, the Commission's "Best Practices,"¹ the Robocall Mitigation Database Report and Order,² and the Eighth Report and Order on Advanced Methods to Target and Eliminate Unlawful Robocalls³ adopts this Caller ID Authentication and Robocall Mitigation Plan ("Plan"). This Plan is current as of its submission date and is subject to annual recertification and update as required by the Commission's rules. This Plan may also be updated as necessary to further comply with amended Commission regulations and requirements.

¹ Call Authentication Trust Anchor, WT Docket No. 17-97; Wireline Competition Bureau Invites Comment on Caller ID Authentication Best Practices, WC Docket No. 20-324; Wireline Competition Bureau Issues Caller ID Authentication Best Practices, DA 20-1526 (December 22, 2020).

² Improving the Effectiveness of the Robocall Mitigation Database, WC Docket No. 24-213, Report and Order, FCC 24-135 (January 8, 2025); effective February 5, 2026.

³ Advanced Methods to Target and Eliminate Unlawful Robocalls, CG Docket No. 17-59, Eighth Report and Order, FCC 25-15 (February 27, 2025); DNO blocking effective December 15, 2025; SIP 603+ requirements effective March 25, 2026.

Commitment.

Pursuant to Section 64.6305 of the Commission's rules, 47 C.F.R. § 64.6305, Voipwell, LLC commits to take all such reasonable steps to avoid originating illegal robocall traffic and shall include a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (the Industry Traceback Group, or ITG), and to cooperate with such entities in investigating and stopping any illegal robocalls that use its service to originate calls. As set forth below, Voipwell, LLC has adapted the North America Numbering Council Call Authentication Trust Anchor Working Group's Best Practices for the Implementation of Call Authentication Frameworks into its Plan.

Company Information.

The name, title, department, business address, telephone number, and email address of the person within the company responsible for addressing robocall mitigation related issues is as follows:

Nicholas DiGaetano

President

Voipwell, LLC

127 Twin Oak Ter

Tannersville, PA 18372

Telephone: (570) 213-5155

Email: ndigaetano@voipwell.com

Voipwell, LLC is not a foreign voice service provider and does not serve subscribers who are not American Companies. Voipwell, LLC maintains an operating company number (OCN 842K) and has direct access to telephone numbers from the North American Numbering Plan Administrator (NANPA) and/or the National Pooling Administrator.

Ownership and Principal Disclosure.

Voipwell, LLC is a Pennsylvania limited liability company. Nicholas DiGaetano is the sole owner and principal of Voipwell, LLC. There are no additional owners, partners, or principals with an ownership interest or management control over the company. This disclosure is consistent with the ownership and principal information submitted to the Robocall Mitigation Database and the Commission Registration System (CORES).

Enforcement History.

Neither Voipwell, LLC, nor its owner and principal Nicholas DiGaetano, nor any affiliate of Voipwell, LLC, has been the subject of any enforcement action, investigation, or official inquiry by the Federal Communications Commission, law enforcement, or any regulatory agency relating to suspected unlawful robocalling, caller ID spoofing, or any violation of the Commission's robocall mitigation rules. No prior Voipwell, LLC certification has been removed from the Robocall Mitigation Database, nor has Voipwell, LLC been prohibited from filing in the RMD.

STIR/SHAKEN Implementation.

Voipwell, LLC (OCN 842K) has fully implemented the STIR/SHAKEN caller ID authentication framework across 100% of the IP portions of its network. Voipwell, LLC's STIR/SHAKEN implementation includes the following capabilities:

- All public certificates are cached locally for optimal performance and reliability.
- All originating calls are signed using Voipwell, LLC's own SPC token and certificate.
- All received calls are verified down to the root certificate.
- Certificate revocation status is checked for each received call.
- Verification results are displayed on customers' phones.

Voipwell, LLC uses its own certificate and makes its own attestation decisions for all originating traffic, consistent with the Commission's requirements regarding third-party authentication adopted in the Eighth Report and Order (FCC 25-15). Voipwell, LLC does not rely on any third party to sign calls or make attestation decisions on its behalf.

Subscriber Vetting.

Voipwell, LLC fully vets all subscribers before providing service to the subscriber. Voipwell, LLC obtains specific subscriber information including service locations and principals, if commercial subscribers, and verifies location for all subscribers. Further, Voipwell, LLC compares information provided by the subscriber against underlying carrier records to verify accuracy and authentication and validate subscriber information. Subscribers are served under a service agreement.

Voipwell, LLC monitors its subscribers' traffic for call, originating number and terminating number irregularities in conjunction with its underlying carriers, and should irregularities be determined, will immediately contact the subscriber as part of its investigatory process. Voipwell, LLC does not grant, nor can it grant, right-to-use telephone number resources.

Telephone Number Validation.

For new subscribers, Voipwell, LLC will assign telephone numbers to the account, unless the account has ported from another subscriber. Voipwell, LLC will ensure that only those subscriber telephone numbers held by its subscribers may originate traffic. For toll-free numbers, Voipwell, LLC will verify the underlying ten-digit number and ensure that only calls from the assigned numbers may originate calls.

Know-Your-Upstream-Provider Compliance.

Voipwell, LLC is primarily an originating voice service provider that assigns telephone numbers directly to its subscribers. Voipwell, LLC does not operate as a gateway provider or intermediate provider and does not accept traffic for origination from upstream voice service providers.

To the extent Voipwell, LLC receives traffic from any upstream source, Voipwell, LLC verifies that such provider maintains a valid and current certification in the FCC's Robocall Mitigation Database prior to accepting any traffic. Voipwell, LLC will not accept traffic from any voice service provider or intermediate provider whose RMD filing has been removed, is deficient, or is otherwise not in compliance with the Commission's rules.

Blocking of Non-Compliant Traffic.

Consistent with the Commission's requirements under 47 C.F.R. § 64.6305, Voipwell, LLC will not accept voice traffic directly from any voice service provider, intermediate provider, or gateway provider that does not have a current, valid certification filed in the Robocall Mitigation Database. Voipwell, LLC monitors the RMD status of providers from which it receives traffic and will block traffic from any provider whose certification has been removed or is otherwise non-compliant.

Do-Not-Originate (DNO) List Compliance.

Pursuant to 47 C.F.R. § 64.1200(o) and the Eighth Report and Order (FCC 25-15), Voipwell, LLC maintains and enforces a reasonable Do-Not-Originate (DNO) list to block calls that purport to originate from numbers that should never place outbound calls. Voipwell, LLC's DNO list includes, at a minimum, the following categories of numbers:

- Numbers that are not dialable under the North American Numbering Plan (invalid NPA-NXX formats).
- Valid NANP numbers that have never been allocated or assigned to a provider (unallocated numbers).
- Allocated but currently unused numbers.
- Inbound-only government numbers where the government entity has requested inclusion on the DNO list.
- Private inbound-only numbers that have been used in impersonation scams, when the number holder has requested inclusion.

Voipwell, LLC keeps its DNO list current and regularly updates it to reflect changes in number assignments and allocations. When a call is identified as originating from a number on the DNO list, Voipwell, LLC blocks the call before it is transmitted further into the network. Voipwell, LLC ensures that its DNO list is reasonable in scope and not so limited as to omit obvious categories of numbers that should be included, consistent with the Commission's guidance.

SIP 603+ Call Blocking Notification.

In accordance with the Eighth Report and Order (FCC 25-15) and 47 C.F.R. § 64.1200(k)(12), Voipwell, LLC will use SIP code 603+ exclusively to provide immediate notification to callers when calls are blocked based on the use of reasonable analytics. Voipwell, LLC will be fully compliant with this requirement by the effective date of March 25, 2026. SIP code 603+ is not used for calls blocked based on the DNO list, calls blocked pursuant to Commission notification not based on analytics, or calls blocked at the request of a customer without the use of analytics.

Erroneous Blocking Point of Contact.

Pursuant to 47 C.F.R. § 64.1200(p)(2), Voipwell, LLC has established and made publicly available a point of contact for subscribers and other voice service providers to report erroneous call blocking. Reports of erroneous blocking may be directed to:

Nicholas DiGaetano

Telephone: (570) 213-5155

Email: ndigaetano@voipwell.com

Voipwell, LLC will investigate all reports of erroneous blocking promptly and take corrective action as appropriate.

Network Traffic Monitoring, Analysis and Investigation.

Consistent with its commitment above, Voipwell, LLC will respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium (ITG), and to cooperate with such entities in investigating and stopping any illegal robocalls that use its

service to originate calls.

Voipwell, LLC is coordinating with its underlying carriers to monitor subscribers' traffic, identify traffic anomalies for which Voipwell, LLC will investigate, and to immediately block subscriber service if robocalling is suspected. Detection of illegal activity and multiple violations will result in service termination. In monitoring network usage, particular attention is given to:

- Higher than normal subscriber traffic volume, including large bursts of traffic in small timeframes or inconsistent volumes of traffic.
- Originating calls of short duration and low call completion percentages.
- Originating calls with sequential called-to-number dialing patterns.
- Repeated calls made to Do-Not-Call registry numbers or invalid numbers.
- Calls to NPA-NXXs not assigned by the North American Numbering Plan Administrator.

Call Analytics.

Voipwell, LLC utilizes proprietary call detail record analysis tools to monitor and analyze call traffic patterns across its network. These tools enable Voipwell, LLC to identify anomalous calling patterns, high-volume call activity, and other indicators of potential illegal robocalling. Voipwell, LLC does not use a third-party call analytics vendor for this purpose; all call analytics are performed in-house using Voipwell, LLC's own proprietary monitoring systems.

Ongoing Robocall Mitigation and Annual Recertification.

Voipwell, LLC anticipates that its Plan will evolve as it makes Plan enhancements, as underlying carriers enhance their own plans, and as the Trust Anchor and industry generally gain experience in caller ID authentication protocols.

Voipwell, LLC will recertify the accuracy of its Robocall Mitigation Database filing annually on or before March 1 of each year, as required by 47 C.F.R. § 64.6305(h). Voipwell, LLC will update any information submitted to the RMD or CORES within 10 business days of any change to such information, as required by 47 C.F.R. § 1.8002(b)(2). Voipwell, LLC will maintain this Plan in current and accurate condition at all times.