

Vision CTS LLC
Robocall Mitigation Plan

Introduction

This document details the reasonable steps and actions taken by Vision CTS LLC (“VCTS”) to mitigate and eliminate illegal robocalling. VCTS has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting fraudulent voice activity. VCTS provides Voice and Interconnected Voice over Internet Protocol (“VoIP”) calling services. The OCN for VCTS is 125J. VCTS works with Neustar as our STIR/SHAKEN certificate authority.

Know Your Underlying Provider

Vision CTS LLC has master service agreements with our upstream providers and has received written assurances from their officials that it has and will continue to sign calls submitted to Vision CTS LLC and will abide by the FCC’s STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to VCTS. VCTS and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Know Your Customer

Screening interviews are performed to understand potential customer business models and the potential, or lack thereof, for involvement in fraudulent robocalling schemes. VCTS collects standard business information such as company name, address, tax ID and contact information of key individuals.

In our research of the prospect, VCTS will not activate clients that provide anonymous information or where data mismatches are found. Additionally, prospects are required to agree to VCTS’s strict policies and contractual terms prohibiting the act of fraudulent voice activity as a condition of doing business with VCTS.

Individuals associated with prospects or current customers who have been known to act improperly or otherwise be involved in fraudulent robocalling will cause their companies to be rejected by VCTS as a customer and any existing customer relationships could potentially be severed.

Traceback Requests

VCTS is committed and will respond fully within 24 hours to all Traceback Requests from the FCC, law enforcement agencies, and the industry traceback consortium and vows to cooperate with these agencies in investigating and stopping any illegal robocallers that use our service to make calls. VCTS will devote sufficient resources to provide prompt and complete information to traceback requests. Our point of contact to handle all traceback requests is:

Chad C. Brownfield
Operations Manager
614-807-5501

All SIP traffic traverses a packet broker and we can review call data as needed. We can also review platform and SBC logging as well as Call Detail Records.

If a traceback exposes an existing customer as the source of fraudulent robocalls, or as having transmitted fraudulent robocalls, a demand for an explanation and verification of mitigation of the traffic is issued to the customer. If the fraudulent traffic is not remediated, VCTS immediately begins rejecting all traffic from the offending customer.

Telephone Numbers

A Telephone Number ("TN") based caller identity is the originating phone number included in call signaling used to identify the caller for screening purposes that is uniquely associated with the subscriber. A subscriber is permitted to use a TN as a caller identity if a TN is directly managed by VCTS and/or obtained by VCTS from VCTS's upstream carrier for use by the subscriber. Numbers can also be allocated by VCTS or ported using information from previous bill matching customer information. If ported, VCTS checks those numbers in a database search.

For subscribers with multi-line telephone systems, VCTS only allows calls to be connected if the originating number matches one of the TN's assigned to the subscriber. This screening capability enables an automated and secure method of validating originating telephone numbers.

International Calling

VCTS is not currently an international voice services provider. If at any time VCTS does decide to sell our services to international customers using North American Numbering Plan resources, we will familiarize ourselves with and develop best practices for full vetting of such customers and perform the necessary telephone number validation on all international originated calls.

Call Analytics

VCTS must rely on our upstream provider and/or their third-party vendors to determine if originating calls should be blocked based on call analytics practices.

Ongoing Robocall Mitigation

VCTS monitors and examines call detail records (CDRs) on a repeating basis to detect suspicious call activity and/or calling patterns. When we detect network usage patterns consistent with illegal robocalls or suspect illegal robocalling is taking place, we will immediately seek to identify the party that is originating, terminating, or routing these calls so that we may take appropriate action. The actions taken may include, but are not limited to initiating a traceback investigation; verifying that the originating customer owns or is authorized to use the Caller ID number; determining whether the Caller ID name sent to a receiving party matches the customer's corporate and/or d/b/a name; and/or providing notice to law enforcement authorities. VCTS contracts support this practice.

As part of our Plan to mitigate and prevent any originating robocalls, we are committed to early identification and investigation of possible robocalling conditions. Among other things, we watch for higher-than-normal subscriber traffic volume, including large bursts of traffic in small timeframes or spikes in usage. We also monitor for originating calls of short duration and low call completion percentages, originating calls with sequential called to number dialing patterns.

VCTS Contact for Robocall Mitigation-Related Issues

The Company will update our Robocall Mitigation filings within 10 business days of any change to the information outlined in this plan. Please direct any questions related to Robocall Mitigation issues to:

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