

Varay Systems, LLC

Robocall Mitigation Plan

Provider Information

Provider Name: Varay Systems, LLC
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I. Scope of Robocall Mitigation Plan

This plan details the steps taken by Varay Systems, LLC to prevent the origination of illegal robocalls on its network, in compliance with the FCC's Robocall Mitigation Rules under 47 CFR § 64.6305. As a reseller of SIP trunk services utilizing Telnyx, we follow strict protocols to ensure compliance.

II. STIR/SHAKEN Implementation

Varay Systems, LLC relies on Telnyx as its SIP trunk provider, which is STIR/SHAKEN compliant.

STIR/SHAKEN Status: All SIP-originated traffic passing through Telnyx is authenticated with STIR/SHAKEN in the IP-based portions of the network.

Non-IP Traffic: Where STIR/SHAKEN cannot be implemented due to network limitations, Varay Systems, LLC has implemented the robocall mitigation measures described below.

III. Robocall Mitigation Measures

1. Customer Vetting Procedures

- We require all customers utilizing our SIP trunk services to provide legitimate business identification, including:
- Business Name
- Federal EIN
- Valid Contact Information.

Customers with incomplete or suspicious information are denied service until validated.

2. Traffic Monitoring

We actively monitor SIP traffic patterns using analytics and tools provided by Telnyx.

We flag the following suspicious traffic behaviors:

- High call volumes to known invalid or unallocated numbers.
- Short-duration calls indicative of robocall patterns.

- Sequential dialing patterns.

3. Call Blocking and Reporting

We utilize Telnyx's blocking tools to prevent known illegal robocall traffic from being originated on our network.

Calls to numbers on the FCC's Do Not Originate (DNO) list are automatically blocked.

Any illegal traffic detected is reported to the FCC Enforcement Bureau and our upstream provider (Telnyx) promptly.

4. Customer Education and Terms of Service Enforcement

Our Terms of Service prohibit customers from originating illegal robocalls.

Customers are required to comply with the Telephone Consumer Protection Act (TCPA) and other federal/state regulations.

Violation of these terms results in suspension or termination of service.

5. Coordination with Telnyx

As a reseller, we work closely with Telnyx to ensure end-to-end compliance with STIR/SHAKEN and robocall mitigation.

We escalate any suspicious or malicious traffic patterns detected for further investigation.

IV. Compliance Reporting and Certification

Certification: Varay Systems, LLC has filed its certification in the FCC Robocall Mitigation Database and will update the certification promptly to reflect any changes to this plan.

Monitoring and Auditing: This plan is reviewed annually or as required to ensure continued compliance.

V. Contact for Enforcement Bureau Inquiries

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VI. Conclusion

Varay Systems, LLC takes its role in preventing illegal robocalls seriously. By implementing robust customer vetting, traffic monitoring, and coordination with STIR/SHAKEN-compliant providers such as Telnyx, we actively mitigate unlawful robocall traffic originating from our services.