

Vestacall Limited Robocall Mitigation Plan

Company Information

Company Name: Vestacall Limited

Address: Suite C, Level 7, World Trust Tower, 50 Stanley Street, Central, Hong Kong

President: Aliza Hayat

FRN: 0033602707

Robocall Mitigation Database ID: RMD0013455499

FCC Form 499 Filer ID: 836011

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This Robocall Mitigation Plan ("RMP") is submitted by **Vestacall Limited** for inclusion in the Federal Communications Commission (FCC) Robocall Mitigation Database pursuant to 47 CFR § 64.6300–64.6305.

Vestacall Limited transmits voice traffic received from vetted international carriers, foreign enterprise customers, and authorized U.S. carrier partners.

Vestacall Limited does not originate robocall campaigns or autodialed traffic and does not serve as a U.S. gateway provider or the first U.S. point of entry for foreign traffic under 47 CFR § 64.6300.

Prior Investigations Disclosure

Vestacall Limited certifies that, during the previous two (2) years, it has not been subject to any formal investigation, enforcement action, citation, or regulatory proceeding by the FCC, U.S. law enforcement authorities, or any governmental agency relating to illegal robocalls, caller ID spoofing, or robocall mitigation compliance.

Vestacall Limited will update this disclosure in the FCC Robocall Mitigation Database within ten (10) business days should any such action occur, in accordance with 47 CFR § 64.6305.

Traffic Origination Profile

Vestacall Limited carries wholesale voice traffic from vetted international carriers, foreign enterprise customers, and authorized U.S. carrier partners. Traffic transmitted over our network

includes both international-originated and U.S. domestic carrier traffic associated with legitimate business communications.

Vestacall Limited does not originate robocall campaigns, autodialed traffic, or high-risk outbound call center traffic. All customers and upstream carriers are subject to Know-Your-Customer (KYC) and Know-Your-Upstream verification procedures prior to activation.

Vestacall Limited does not knowingly transmit illegal robocalls.

Network Monitoring and Traffic Analytics

Vestacall Limited deploys internal monitoring and analytics systems to continuously evaluate signaling behavior and traffic characteristics associated with U.S.-terminating calls.

Monitoring capabilities include:

- Detection of anomalous call patterns
- Identification of spoofed or invalid Caller IDs
- High-volume or burst traffic detection
- Robocall pattern indicators
- Automated alert generation

Traffic anomalies trigger automated alerts and manual review by network operations personnel. Suspicious or unlawful traffic may be blocked, rate-limited, or suspended pending investigation.

Customer and Service Controls

Service Restrictions

Vestacall Limited prohibits customers whose traffic profile consists primarily of outbound call center or robocall-type activity. Traffic profiles must reflect legitimate business communications.

Caller ID Authentication

Customers may transmit only Caller IDs they are authorized to use. Vestacall Limited validates number ownership or authorization prior to provisioning Caller ID inventory.

Do-Not-Originate (DNO) Protection

Vestacall Limited blocks calls using numbers listed on the FCC Do-Not-Originate registry and other known invalid, spoofed, unallocated, government, or emergency numbering ranges.

Know-Your-Customer (KYC)

Vestacall Limited maintains a comprehensive KYC onboarding process including:

- Legal business registration verification
- Identity and ownership validation
- Operational use case assessment
- Service intent confirmation
- Robocall risk screening

High-risk customers are rejected or prohibited. These procedures align with 47 CFR § 64.1200(n)(4).

Reseller Verification

Wholesale resellers must certify legitimate telecommunications operations. Vestacall Limited verifies reseller business presence, domain ownership, and service legitimacy prior to activation.

Traceback Cooperation and Enforcement

Vestacall Limited fully cooperates with traceback requests from U.S. carriers, the USTelecom Industry Traceback Group (ITG), and regulatory authorities.

Upon receipt of a traceback request, Vestacall Limited responds within twenty-four (24) hours or sooner where possible and provides available call detail records, routing information, and upstream source identification.

Accounts associated with illegal robocalls or violations of Vestacall Limited's Acceptable Use Policy (AUP) are subject to immediate suspension or termination. Confirmed illegal traffic sources are permanently blocked.

Vestacall Limited retains call detail records and customer authentication records for a minimum of two (2) years to support traceback and regulatory inquiries.

Upstream Provider Compliance

Vestacall Limited receives traffic from enterprise customers and wholesale upstream carriers.

Upstream providers are required to:

- Maintain robocall mitigation programs
- Prohibit illegal robocalls and spoofing
- Comply with FCC requirements
- Cooperate with traceback requests

Vestacall Limited periodically reviews upstream traffic patterns and may suspend or block non-compliant sources.

STIR/SHAKEN Framework

Vestacall Limited does not originate domestic U.S. numbering resources as an originating voice service provider.

Where STIR/SHAKEN authentication is present, Vestacall Limited relies on the attestation applied by the originating provider. Vestacall Limited performs verification checks on received signaling and applies additional robocall mitigation analytics, caller ID validation, DNO blocking, and traceback procedures.

International and non-IP traffic that cannot support STIR/SHAKEN authentication is subject to enhanced monitoring, anomaly detection, and blocking controls consistent with FCC foreign provider mitigation expectations.

Continuous Mitigation Enhancement

Vestacall Limited continuously strengthens its robocall mitigation controls through:

- Ongoing traffic trend analysis
- Updates to robocall detection indicators and blocking rules

- Monitoring of emerging robocall patterns
- Upstream and customer audits
- Cooperation with industry peers and regulatory initiatives

Compliance Monitoring and Updates

Vestacall Limited actively monitors FCC regulatory developments and industry guidance related to robocall mitigation.

Vestacall Limited commits to:

- Updating its Robocall Mitigation Database filing within ten (10) business days of any material change
- Maintaining accurate RMD information
- Annual RMD recertification by March 1

in accordance with 47 CFR § 64.6305.

Officer Certification

I, Aliza Hayat, President of Vestacall Limited, certify under penalty of perjury that the information contained in this Robocall Mitigation Plan and in the FCC Robocall Mitigation Database filing is true, accurate, and complete to the best of my knowledge.

Vestacall Limited has implemented reasonable and effective measures to mitigate illegal robocall traffic in accordance with 47 CFR § 64.6300–64.6305 and commits to ongoing compliance with all applicable FCC rules.

Date: 20 February 2026

Name: Aliza Hayat

Title: President

Company: Vestacall Limited