

Vonayo, LLC
Robocall Mitigation Efforts
3/14/2024

1. Vonayo, LLC commits to respond within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement and the industry traceback consortium and to cooperate with such entities in investigating and stopping any illegal robocallers from using its services to originate calls.
2. Using the questionnaire and onboarding procedures attached, Vonayo, LLC screens all applicants for its services to determine if they are intending to use such services for autodialing from a database of numbers for purposes of telemarketing without having received written permission from the called parties. Calls to wireline numbers for purposes of political campaigning, market research or polling are deemed legal.
3. Vonayo, LLC will block services to a customer if it determines that the customer is using the services for illegal robocalling.
4. Vonayo, LLC will only accept traffic for termination from companies that are in the Robocall Mitigation Database after September 28, 2021.
5. Vonayo, LLC uses no analytic systems, software or third-party vendors at this time to identify and block illegal robocall traffic.

ROBOCALL MITIGATION AND KNOW YOUR CUSTOMER QUESTIONNAIRE

Vonayo, LLC is committed to compliance with the Telephone Customer Protection Act (TCPA), the TRACED Act (Telephone Robocall Abuse Criminal Enforcement and Deterrence) and the rules of the Federal Communications Commission pertaining to the prevention of illegal robocalling, fraudulent calling and other illegal use of its network. To that end, Vonayo, LLC requires each customer to complete the following questionnaire to enable Vonayo, LLC to properly conduct the necessary due diligence to comply with the law and protect its network.

For purposes of this form, the “Customer” is the entity subscribing to services from Vonayo, LLC.

SECTION A

Question	Response
If Customer is an entity, what type of entity (corporation, LLC, etc.):	
Customer name, including all trade names, fictitious names and DBAs under which Customer has transacted business for the previous three years:	
State or country of formation:	
Federal taxpayer identification number (EIN) for US domestic entities:	
499 filer identification number for US entities:	
Business license or registration number and the name of the government entity that administers such registration or license:	
A description of Customer’s business, including whether Customer uses an auto-dialer or engages in telemarketing:	

Physical address of Customer's business:	
Name, physical address, email address and telephone number of the person responsible for payment of Customer's account with Vonayo, LLC and the form of payment to be used:	
Name, physical address, email address and telephone number of the natural persons who directly or indirectly own the Customer:	
Name, telephone number and email address of Customer's employee responsible for compliance with US state and federal laws pertaining to illegal robocalls:	
Websites and any social media pages used by Customer currently and over the past three years (leave blank if none):	
Customer's current IP addresses and any IP addresses used by Customer over the past three years:	

Has Customer (or its owners or controlling persons) have ever had an adverse judgment against it in a civil lawsuit relating to illegal robocalling? ☐ Yes ☐ No

Is Customer a wholesale provider (reselling Vonayo, LLC's services to other carriers or to end users)? ☐ Yes ☐ No

SECTION B

If Customer is a wholesale provider, by signing below, Customer represents and warrants to Vonayo, LLC, and agrees to the following. If Customer is not a wholesale provider and is not reselling the services of Vonayo, LLC but instead will use them for its own account, this section does not apply:

- Customer has not been determined by USTelecom’s Industry Traceback Group to be a “Non-Cooperative Voice Service Provider.”
- Customer has not been blocked from another voice service provider’s network after being determined to have violated laws or regulations pertaining to illegal robocalling, fraudulent calling, illegal telemarketing practices or otherwise has been determined to be a “bad-actor upstream voice service provider.”
- Customer has implemented the STIR/SHAKEN Authentication Framework and/or registered in the Robocall Mitigation Database.
- Customer agrees to notify Vonayo, LLC within 24 hours (i) if Customer is determined by USTelecom’s Industry Traceback Group to be a “Non-Cooperative Voice Service Provider” or has been blocked from another voice service provider’s network after being determined to have violated laws or regulations pertaining to illegal robocalling, fraudulent calling, illegal telemarketing practices or otherwise has been determined to be a “bad-actor upstream voice service provider,” or (ii) if Customer, or its owners or controlling persons, are subject to an adverse judgment in a civil lawsuit relating to the transiting of illegal robocalls.
- Customer agrees, upon Vonayo, LLC’s request, to promptly provide Vonayo, LLC with the identity of a customer or end user of Customer that was the source of reportedly illegal call traffic Customer routed to Vonayo, LLC.
- Customer will screen existing customers and end users using questions substantially similar to those set forth in Sections A and B of this Questionnaire.
- For any customer or end user of Customer that indicates to Customer that it is either foreign or engaged in telemarketing, and that it originates or otherwise transits autodialed call traffic and/or intends to do the same as a customer, Customer shall not route to Vonayo, LLC any such call traffic from such customer or end user until Customer notifies Vonayo, LLC and takes reasonable steps to screen the legitimacy of the proposed autodialed call traffic, including, without limitation, obtaining, verifying and providing to Vonayo, LLC the following:
 - a. the name, point of contact and contact information for the entity on whose behalf the originating caller is proposing to make the autodialed calls;
 - b. a description and sample recording or transcript (in English) of the proposed autodialed calls;
 - c. a list of the proposed ANIs to be autodialed;
 - d. the originating caller’s subscription number to the Federal Do-Not-Call Database;
 - e. a statement as to whether the originating caller would be undertaking the proposed calls with the consent of the proposed autodialed call recipients and, if so, a description and sample evidence of how such consent was obtained;
 - f. the proposed calls per second for the relevant autodialed call campaign;
 - g. the proposed dates of the relevant autodialed call campaign.

The undersigned is an officer of Customer with authority to execute this questionnaire and bind Customer to the provisions herein and further certifies that the information set forth above is complete and accurate the knowledge of the undersigned after reasonable inquiry.

Customer Name:

Signed by (print name):

Title:

Date:

**ROBOCALL MITIGATION AND
KNOW YOUR CUSTOMER ONBOARDING CHECKLIST**

Customer Name: _____

Wholesale: ☐ Yes ☐ No

Due Diligence

- ☐ Robocall Mitigation and Know Your Customer Questionnaire Received
- ☐ Customer contacted by telephone to confirm its service description and accuracy of information provided
- ☐ Customer website and social media pages reviewed (if any)
- ☐ Unless Customer is an individual, Customer name search conducted in state of formation to verify active status
- ☐ Internet search conducted using Customer name and names of all owners
- ☐ Court records search conducted in state of formation (if available) using Customer name and names of all owners
- ☐ Identified IP address location and it is not foreign for the Customer
- ☐ If a wholesale customer, reviewed Customer's Robocall Mitigation Plan on file with the FCC
- ☐ Conducted 499 filer ID search using Customer's name

Screening Results

Customer has provided all material information and documentation requested.

☐ Yes ☐ No

All information reviewed is correct as reported by Customer.

☐ Yes ☐ No

If Customer is an entity, Customer is registered as a business with the state or country of its principal place of business.

☐ Yes ☐ No

Customer has an EIN (if a domestic US entity), a website and an employee responsible for legal compliance prohibiting illegal robocalling or compliance policies pertaining to robocalling.

☐ Yes ☐ No

There are no irregularities or contradictory information in Customer's public filings.

☐ Yes ☐ No

No adverse judgment against Customer or its owners or controlling persons was reported or found arising out of a civil lawsuit relating to the transiting of illegal robocalls.

☐ Yes ☐ No

For wholesale customers:

Customer has not been the subject of, or calls dialed, originated, transmitted, or routed by Customer have not been the subject of, a total of three or more traceback requests or upstream or downstream line carrier complaints sent to or shared with Customer during any 60 day period; provided, however, that tracebacks and/or complaints regarding the same call or same call campaign on the same day are not treated as separate tracebacks.

☐ Yes ☐ No

Customer has not been determined by USTelecom to be a "Non-Cooperative Voice Service Provider" nor been blocked from another voice service provider's network after being determined to have violated laws or regulations pertaining to illegal robocalling, fraudulent calling, illegal telemarketing practices nor

otherwise has been determined to be a “bad-actor upstream voice service provider.”

☐ Yes ☐ No

Customer has implemented the STIR/SHAKEN Authentication Framework, if required, or filed with the Robocall Mitigation Database.

☐ Yes ☐ No

If foreign, Customer has an email address at the same domain name as its website, and/or pays for services by either bank ACH transfer, wire transfer or credit card.

☐ Yes ☐ No

Completed this ____ day of _____.

By: _____

Name: _____

This checklist must be scanned and saved in the Customer file along with Customer’s responses to the Robocall Mitigation and Know Your Customer Questionnaire. If any responses in the Screening Results are NO, Customer will be rejected pending review and approval by senior management after satisfactorily resolving any issues flagged by the Screening Results.