

Vail Systems Robocall Mitigation Program

This Robocall Mitigation Program document describes Vail Systems, Inc.'s (Vail) robocall mitigation program and traceback measures.

Business Description

Vail is a voice service provider which offers cloud-hosted telephony, contact center services, and an enhanced network services platform. The hosted environment provides IVR; call routing; recording services; interaction analytics; transcription; call risk scoring and caller authentication; voice clarity measurement and enhancement; and customer service and related analytics services. Vail does business as Vail Systems, Inc., Versay LLC (Versay), Prosodica LLC (Prosodica), and FreeClimb LLC (FreeClimb). Vail has formerly conducted business as Aspen Telecommunications LLC, Verascape Inc., Webley Systems Inc., and Whistle Phone LLC.

Vail is not a foreign voice service provider.

VSP Robocall Mitigation Certification

Pursuant to 47 CFR § 64.6305, Vail certifies that it has partially implemented the STIR/SHAKEN authentication framework and that calls that originate on its network are subject to the robocall mitigation program detailed below. As an enhanced network services company, Vail integrates with the public switched telephone network (PSTN) via major voice carriers who are STIR/SHAKEN compliant.

Robocall Mitigation Program

Vail implements the following measures to avoid originating, carrying, or processing illegal robocall traffic. Vail also commits to respond fully, and in a timely manner, to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. These measures include Know Your Customer practices, Know Your Upstream Provider practices, technical robocall mitigation controls, contractual controls, and traceback protocol.

Know Your Customer

Vail performs due diligence checks on new customers. Some of these processes include an assessment of business and calling needs (to identify potential autodialing or marketing campaigns) along with customer identification verification (such as business address, authorized users, and personal information of business point of contact). Typical customers of Vail, Versay, and Prosodica are established enterprises with customer service needs. FreeClimb, as a Communications Provider as a Service (CPaaS) platform, may have individual consumers and small businesses as end users. Additional due diligence checks are thus performed on new potential FreeClimb customers by running sign-up requests through a third-party risk scoring service to prevent fraudulent/suspicious sign-ups. FreeClimb also limits outbound calls in trial accounts to a single, verified number.

Know Your Upstream Provider

Vail maintains risk-based procedures to assess upstream providers, evaluating their role and responsibilities in the call-chain. These procedures involve conducting vendor reviews and include a specific review of the applicable provider's robocall mitigation compliance.

Robocall Mitigation

Vail's platform takes a multi-layered approach to managing identity, authentication, fraud, denial-of-service attacks, and robocalls. Vail's dedicated 24/7 operations team focuses on prevention, detection, and mitigation of threats, including robocalls and nuisance traffic. Vail utilizes proprietary network tools to help monitor and enact treatments (such as blocking calls) based on call features (including calling ANIs or CNAM values) that are potentially indicative of robocall behaviors, such as high traffic volume and high ANI velocity. To prevent carrying robocall traffic, calls routed by Vail can be screened by robocall detection systems with the ability to implement special treatments based on STIR/SHAKEN headers, including the attestation level and originating carrier. Those robocall detection systems include proprietary solutions, and solutions provided by third-party vendors Neustar and E-Hawk.

Contracts

If Vail determines that a customer is using its services for illegal activities, including robocalling, the customer's agreement may be terminated pursuant to the terms and conditions.

Tracebacks

Vail is committed to responding fully and within 24 hours to all traceback requests from the Federal Communications Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping any illegal robocallers that use its services to carry or process calls. Vail has procedures in place to respond to traceback requests.

Any incident or request may be reported to Vail's 24/7 Network Operations Center at vnoc@vailsys.com, with the following data points to support investigation:

- Call date & time
- The calling telephone number (ANI)
- The called/dialed telephone number (DNIS)
- Any other relevant call or customer details that may aid the investigation

Contact Information

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