



Visual Network Solutions LLC Robocall Mitigation Compliance with TRACED Act

Visual Network Solutions LLC (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company has fully implemented STIR/SHAKEN in compliance with **47 CFR § 64.6301**.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using the Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, the Company shall block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless the Company’s investigation determines that the traffic is not illegal), in accordance with **47 CFR § 64.1200(n)(2)**. If the Company determines that the identified traffic is not illegal, it shall provide the Enforcement Bureau with an explanation as to why it reasonably concluded that the identified traffic is not illegal and what steps it took to reach that conclusion.

The Company utilizes a combination of internal tools and third-party solutions to check for Do Not Originate (DNO) numbers. In addition, the Company utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes, and unassigned number blocks. The Company also utilizes data analytics to detect and investigate irregular and unexpected calling patterns and originating number use against customer profiles.

Third-Party Analytics Vendors and Upstream Providers

As part of our robocall mitigation efforts, the Company utilizes its upstream providers as third-party analytics vendors to identify and block illegal robocalls. The following upstream providers supply analytics solutions and mitigation services, in compliance with **47 CFR § 64.6305(d)(2)(ii), (e)(2)(ii), and (f)(2)(ii)**:

1. **PayG LLC dba SkySwitch**
Arborcrest 1, 751 Arbor Way, Suite 150
Blue Bell, PA 19422
Phone: 747.777.8100
Email: support@skyswitch.com
2. **CoreDial LLC**
Arborcrest 1, 751 Arbor Way, Suite 150
Blue Bell, PA 19422
Phone: 215.297.4400
Email: cdsupport@skyswitch.com



These vendors provide real-time analytics, fraud detection, and traffic pattern analysis to help identify and mitigate illegal robocalling activity. Their systems work alongside our internal monitoring tools to enhance detection and blocking capabilities.

Know Your Customer (KYC) and Mitigation Processes

The Company uses data systems for analytics and reviews to identify illegal robocalling in addition to a Know Your Customer (KYC) requirement to access the Company's networks, in accordance with **47 CFR § 64.6305(d), (e), and (f)**. The process includes:

- Monitoring the network to identify suspicious traffic patterns.
- Limiting customers' capacity via call-per-second and/or concurrent session limits.
- Regularly checking call patterns for possible abusive traffic.
- Verifying all new customers with a combination of electronic and manual verification systems, credit reviews, references from trusted industry members, and previous experiences with customer executives and employees.
- Severely limiting the capabilities of new accounts until appropriate verification processes are complete.

Traffic Blocking Measures

The Company reserves the right to refuse traffic from any party at any time where robocalling or use of unauthorized originating numbers has occurred or is suspected. The Company has the capability to block:

- Originating number(s)
- Terminating number(s)
- Trunk(s) or customer
- Termination of customer relationship

These measures help prevent robocalling, invalid originating numbers, or spoofed origination numbers from transiting the Company's networks, in compliance with **47 CFR § 64.6305(g)**.

The Company commits to continuously reviewing and improving its robocall mitigation strategies to remain compliant with FCC regulations and industry best practices.