

Vitovio Limited, Robocall Mitigation Plan

Vitovio Limited (“Vitovio”), hereby submits this Robocall Mitigation Plan (“Plan”) as required by 47 CFR Sec. 64.6305(b) & (d) and the Federal Communications Commission (“Commission”) Public Notice dated December 12, 2022, In The Matter of Call Authentication Trust Anchor, WC Docket No. 17-97, DA 22-1303 (“Robocall Notice”). The Plan describes the actions Vitovio takes with respect to foreign-originated robocalls carrying U.S. numbers in the caller ID field.

Vitovio Limited Roles in the Call Chain

Vitovio Limited operates as a voice service provider with a STIR/SHAKEN implementation obligation serving end-users when it provides voice over internet protocol (“VoIP”) services to end-user customers. Vitovio Limited also operates as a gateway provider with a STIR/SHAKEN implementation obligation when it serves as an intermediate provider that receives a call directly from a foreign originating provider or foreign intermediate provider before transmitting the call downstream to another U.S.-based provider. Except as specifically noted in this Plan, Vitovio Limited undertakes the same mitigation steps (as applicable) when it acts as a voice service provider and a gateway provider.

Customer Vetting Process

Vitovio Limited vets the identity of subscribers when (i) approving an application for service; (ii) provisioning network connectivity; (iii) entering into a contract agreement; or (iv) granting the right-to-use any U.S. telephone number resources. Before onboarding customers, Vitovio Limited collects information to confirm their identity including their full legal name, federal tax ID (if applicable), principal place of business, contact person, and state or country of incorporation.

Upstream Provider Vetting Process

Vitovio Limited vets its upstream providers prior to accepting their traffic. Vitovio Limited obtains any potential upstream provider’s physical business location, contact person(s), state or country of incorporation, federal tax ID (if applicable), and the nature of the provider’s business to determine whether they are a legitimate business.

Although Vitovio Limited maintains unique agreements with each of its upstream providers, Vitovio Limited’s agreements with upstream providers generally require each party to comply with applicable law (including FCC rules, regulations, and orders) and valid law enforcement requests, as well as cooperate with one another to investigate and minimize fraud, and allow for either party to terminate for breach.

STIR/SHAKEN Implementation

Monitoring of traffic

STIR/SHAKEN:

Vitovio supports the FCC efforts to implement the STIR/SHAKEN requirements for all IP traffic and passes unaltered to the subsequent intermediate provider or voice service provider in the call path any authenticated caller identification information it receives with a SIP call that passes through Vitovio's Gateway.

Controls on traffic terminated into U.S.:

Vitovio monitors all traffic transiting through its network with regards to behaviours that show illegal, spam and robocalling activity based on several key parameters. These controls are built to work on all Vitovio's traffic, including the traffic originated and terminated into U.S., independently of the technology used, be it IP.

The behaviours monitored are as follows:

- caller IDs that generate an abnormally high amount of calls to a wide amount of B numbers within a given timeframe (several timeframes are monitored)
- caller IDs that generate an abnormally high amount of short calls to a wide amount of B numbers within a given timeframe (several timeframes are monitored)
- caller IDs that have an abnormal or wrong format and that generate material traffic volumes
- Traffic burst from a given traffic source (sending party with respect to Vitovio)
- caller IDs generating material traffic volumes while they should not generate traffic (eg. Roaming ranges MSRN, closed ranges, etc)

Vitovio has also implemented analytics and advanced Machine Learning models to detect robocalls. These models consider a wide range of the call traffic record parameters to determine outliers and possible robocall and spam events.

Based on the results from these controls and analysis, Vitovio may enhance the mitigation of robocalls and spam calls by blocking the traffic proactively, informing the unwanted traffic senders and receivers.

Additionally, any notification on abnormal traffic received from any customer or supplier is investigated accordingly and the necessary actions taken as per Vitovio internal process (eg. traffic block, request traffic removal by the sending party, inform receiving party, etc).

Traceback Commitment

Vitovio Limited commits to respond fully, within 24 hours, to valid traceback requests made by the Industry Traceback Group (ITG), U.S. government agencies (including the FCC), U.S. law enforcement, and to cooperate with such entities in investigating and stopping illegal robocallers that use Vitovio Limited service to originate, carry, or process illegal robocalls.