

Velocity IT Robocall Mitigation Plan

June 13, 2024

Practices and steps taken to mitigate the origination, carrying, or processing of illegal robocalls.

1. STIR/SHAKEN Implementation

- a. All calls originating on Velocity IT's network are signed with proper attestation, in full compliance, using the STIR/SHAKEN framework by Velocity IT switching equipment.

2. Traceback commitment

- a. Velocity IT commits to fully responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium within 24 hours and cooperating in investigating and stopping illegal robocallers.

3. Know-Your-Upstream Provider

- a. Velocity IT sells directly to companies it knows and has a direct relationship with. The company's use of service is known to Velocity IT.
- b. All customers have a signed Master Service Agreement with an Acceptable Use Policy prohibiting illegal or fraudulent calls.

4. New and Renewing Customers

- a. Customers are manually vetted at the time of initial contract and at contract renewal.

5. Analytics and Monitoring

- a. Velocity IT monitors customer traffic to identify irregular changes in call volume and unusual calling activity.
- b. Velocity IT also relies on our wholesale voice providers to identify and report any suspected illegal robocalls.
- c. A manual review of activities is conducted when any irregularities are found or reported.

6. Actions Taken

- a. All traffic found to be in violation of Velocity IT's Acceptable Use Policy and/or to be illegal robocalls is blocked.
- b. Velocity IT does not originate traffic from other voice service providers, non-gateway intermediate providers, or gateway providers. By extension, Velocity IT does not originate traffic from any provider that is not listed in the Robocall Mitigation Database.