

Robocall Mitigation Program Description

Company Overview

Company Name: LDVH Holdings LLC dba Voipocel

Services Provided:

- **Purchase and Resale of Minutes:** We buy communication minutes from various providers worldwide and resell them to our users.
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- **Provision of PBX Services:** We offer Private Branch Exchange (PBX) services, allowing our users to manage their internal phone systems.

Providers:

We source our services from multiple international providers, including:

- Global providers as needed. We conduct temporary and periodic tests to avoid providers with incorrect CLI (Calling Line Identification) signs.

Compliance with STIR/SHAKEN and Mitigation Standards

Implementation Status:

Our company has not fully implemented the STIR/SHAKEN protocol due to our reliance on various external providers. Despite this, we employ a proprietary algorithm to mitigate robocalls effectively.

Unauthenticated SIP Calls:

We receive unauthenticated Session Initiation Protocol (SIP) calls and validate them using our proprietary algorithm. This process involves:

- Checking if the call originates from a server IP listed by our providers.
- Verifying the correct SIP trunk name.

These measures ensure that calls are authenticated based on our own criteria, maintaining the integrity of our services.

Detailed Practices for Robocall Mitigation

Customer Verification:

- **Identification Process:** To reduce spam and fake registrations, we verify the identity and address of our customers through a simple verification process. This includes:
 - Submission of valid ID.
 - Address verification.
- **Caller ID Control:** Customers cannot change their Caller ID. We handle all configurations to ensure consistency and security.

Traffic and Call Volume Control:

- **Channel Limitations:** We initially limit the number of channels per SIP trunk to 3. This can be increased upon request, provided the customer justifies their need.
- **Login Attempt Limitations:** Users are allowed up to 3 login attempts. Exceeding this results in:
 - A 20-minute IP ban for the first offense.
 - A 48-hour IP ban for persistent offenses.
 - Future plans include maintaining a blacklist for repeat offenders.

These measures help control call volume and prevent unauthorized access.

Blocklists:

We maintain a dynamic blocklist of phone numbers known for making spam calls. This list is regularly updated to prevent these calls from entering our network.

Caller ID Analysis and Lookup:

We analyze caller ID based on historical calling patterns to assign reputations (good, bad, neutral) to callers. This helps in identifying and blocking potentially illegal calls.

Dynamic Traffic Analysis:

We employ software platforms to identify traffic patterns. This helps in analyzing information on calls and callers to weed out potential robocalls effectively.

Investigations and User Removal:

If a customer is reported for making spam calls, we:

- Initiate an investigation to verify the claims.
- Remove the user from our service if the investigation confirms spam activity.
- This demonstrates our zero-tolerance policy towards illegal or malicious use of our services.

Cooperation with Investigations

Traceback Requests:

We are committed to cooperating fully with all traceback requests. We ensure that:

- We respond within 24 hours to requests from the FCC, law enforcement, and industry traceback consortiums.

Investigative Cooperation:

We actively assist in investigations to stop illegal calls by:

- Providing relevant data and access to necessary systems.
- Implementing immediate measures to halt identified illegal activities.

Our proactive approach helps in maintaining a secure communication network.

Data Retention and Security

Backup and Maintenance:

- **Backup Retention:** We maintain automated backups of all critical data for 2 years.
- **Data Collected:** We store only essential information, such as:
 - IP addresses.
 - Phone numbers.
 - User details.
- **Privacy Measures:** We do not record conversations, ensuring user privacy while maintaining necessary logs for security purposes.

These practices ensure that we can restore operations swiftly in case of data loss and comply with legal requirements.

Planned Improvements

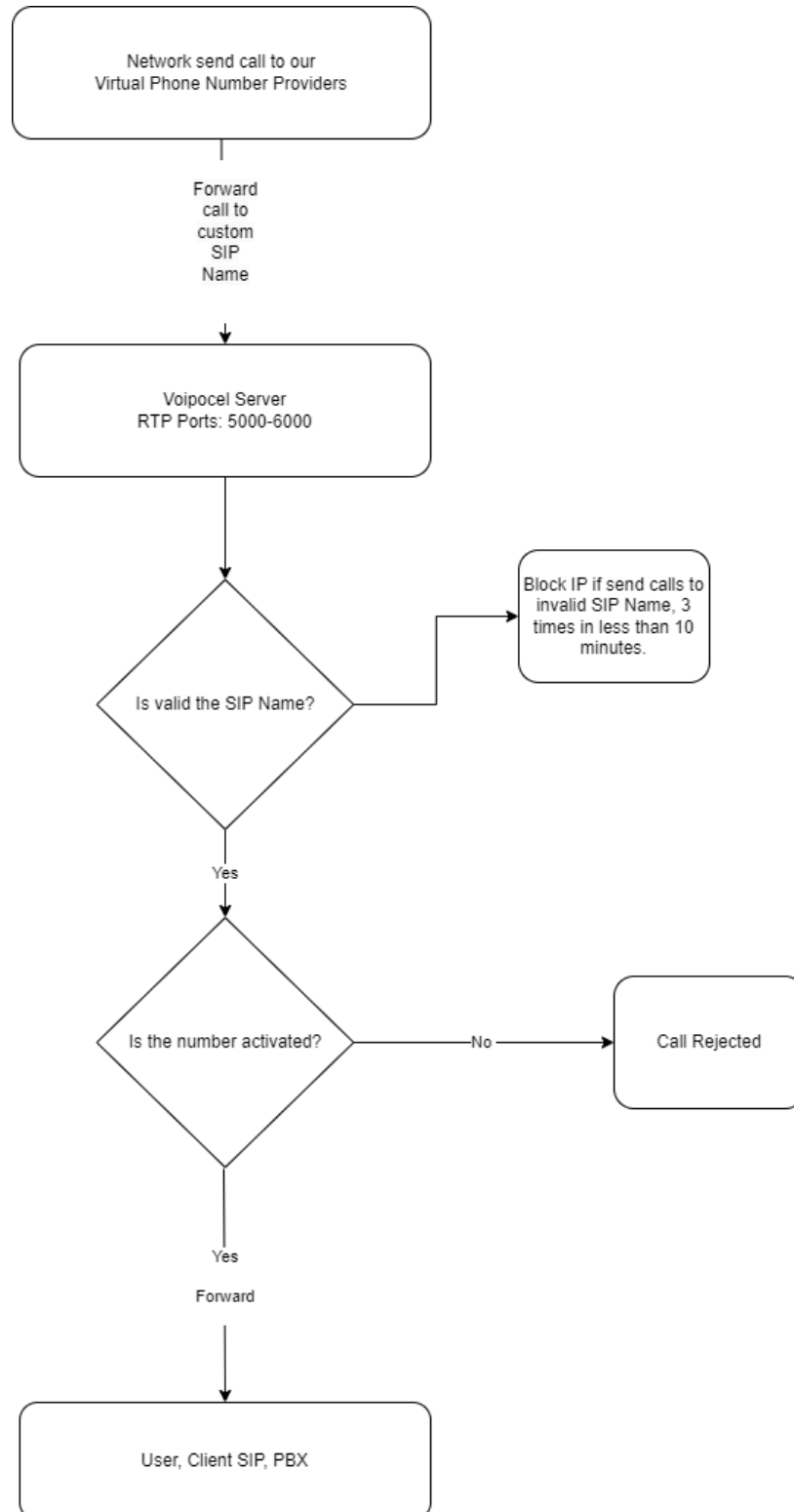
Future Developments:

- **Proprietary SIP Client:** We plan to develop a custom SIP client software tailored for our services. This will:
 - Enhance security.
 - Provide better control over user configurations.
- **Hardware Integration:** We aim to integrate our system with hardware from certified manufacturers like Grandstream and Yealink. This includes:
 - Auto-configuration capabilities.
 - FCC-certified devices to ensure compliance and reliability.

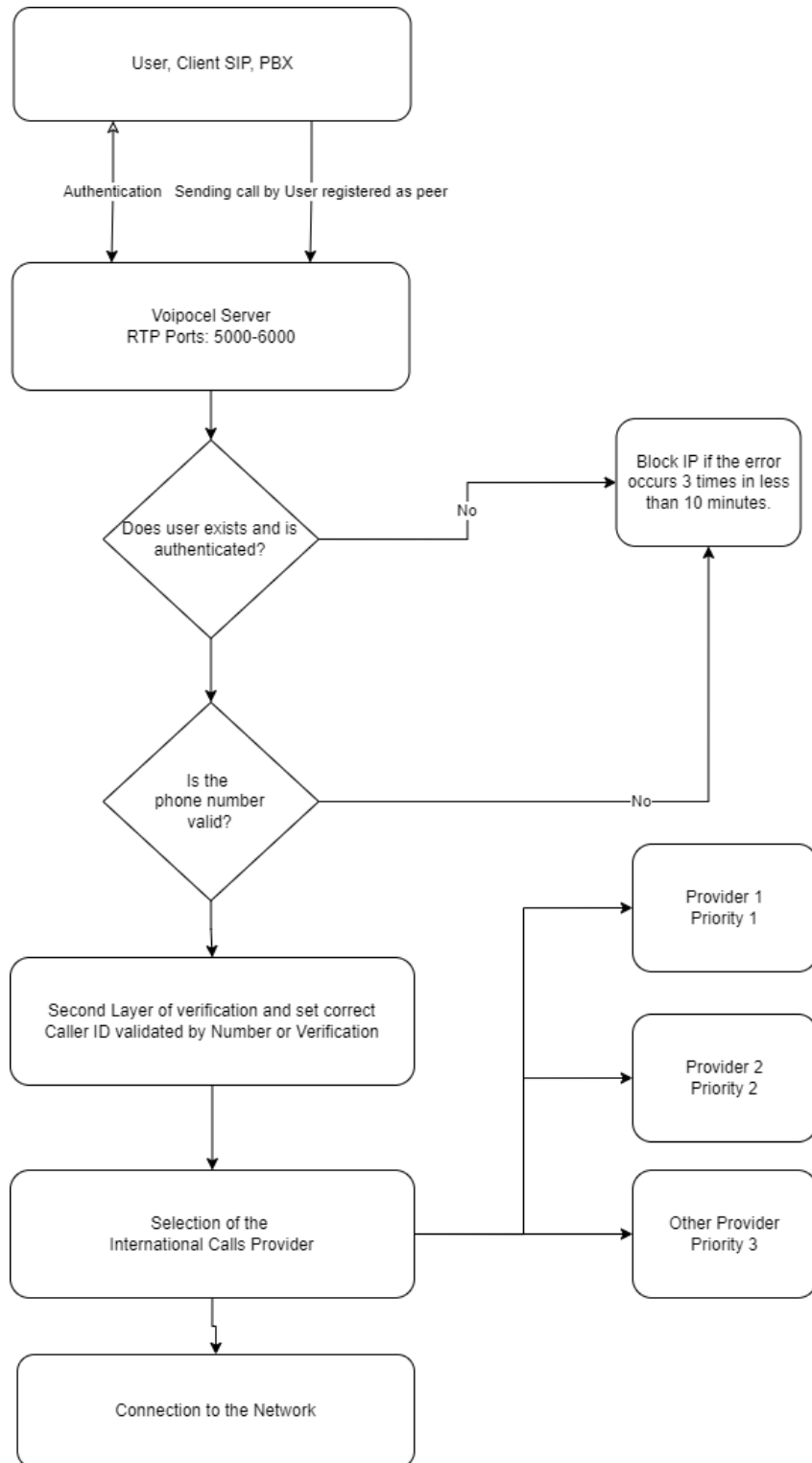
These future improvements will help us provide a more secure and user-friendly service.

Diagrams

Inbound Calls



Outbound Calls



2024-06-28

LDVH Holdings LLC dba Voipocel

Certification

I certify that all calls originating on our network are subject to this robocall mitigation program. This certification has not been removed by Commission action, and we have not been prohibited from filing in the Robocall Mitigation Database.

Signature:

Luis Vargas

President

2024-06-28

LDVH

