

Robocall Mitigation Plan

Business Information

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Contact Information

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Overview

In the Commission's release, *In the Matter of Call Authentication Trust Anchor, Sixth Report and Order and Further Notice of Proposed Rulemaking*, WC Docket No. 17-97 (rel. March 17, 2023) ("R&O") it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

VanillaSoft Inc. ("VanillaSoft") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network. VanillaSoft is a "pure reseller" that has no control over the infrastructure necessary to implement STIR/SHAKEN. The R&O requires that pure resellers such as VanillaSoft now file RMPs. This document delineates VanillaSoft's RMP. Because VanillaSoft does not have access to the necessary infrastructure, it relies on its upstream carriers to assist in robocall mitigation. As delineated herein, VanillaSoft works closely with its upstream providers to carry out the required mitigation functions.

Know Your Customer ("KYC")

The accurate identification of a subscriber in the STIR/SHAKEN ecosystem is tied to a telephone number-based caller identity associated with that subscriber. A subscriber is an entity that has a

business relationship with VanillaSoft in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

VanillaSoft requires each subscriber to provide its name, address, and payment information as well as applicable contact information when they sign up for service. VanillaSoft also limits the use of caller IDs and requires proof that they belong to the subscriber.

Acceptable Use Policy ("AUP")

When signing up for service, subscribers are required to agree to VanillaSoft's AUP. The AUP prohibits, among other things, unlawful use of its service and inappropriate conduct. The AUP further states that VanillaSoft follows the Industry Traceback Group's best practices recommendations and that it will respond promptly to traceback requests and informs the subscriber that VanillaSoft has the right to terminate service in the event of a violation of its AUP.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51, VanillaSoft provides the following information concerning its upstream voice service carrier, which is fully STIR/SHAKEN compliant:

Cloudli Communications ("Cloudli")
1425 René-Lévesque Blvd. W 700
Montreal, Quebec, H3G 1T7
Trey Watson
416-350-7132

To the extent that VanillaSoft were to receive information from law enforcement or other sources that a customer is engaged in illegal robocalling, our policy is to cooperate fully, including providing the identity of any suspected illegal robocaller, pursuant to legal service or process. While VanillaSoft's agreement with its upstream provider contains no provisions specific to robocall mitigation, VanillaSoft has received assurances from that provider that they have and will continue to, sign calls transmitted to VanillaSoft, and will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic.

Analytics for Monitoring Traffic & Investigate Suspicious Activity

VanillaSoft works with its upstream provider to identify behaviors which indicate illegal call activity. VanillaSoft reviews outbound call logs and analytics regularly to monitor for any possible abuse.

VanillaSoft blocks suspicious traffic and reaches out to customers to investigate the noted behavior. VanillaSoft has a zero-tolerance policy when it comes to potential fraud, scam and robocall activities.

VanillaSoft follows the Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, VanillaSoft will devote sufficient resources to provide prompt and complete resources to traceback requests.

Cloudli is the third-party vendor that assists in deploying VanillaSoft's analytics.

Blocking

VanillaSoft will implement Do Not Originate requests it receives from the ITG. VanillaSoft's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If VanillaSoft and/or its upstream carrier identify suspected illegal robocalling patterns, VanillaSoft will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement, the FCC, and the ITG; as well as documenting requests & actions taken in response thereto).

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. VanillaSoft will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, VanillaSoft will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

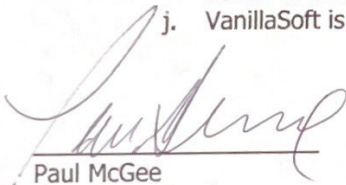
Certification of Paul McGee

I, Paul McGee, VP, Technical Consulting of VanillaSoft Inc. ("VanillaSoft"), do hereby certify, under penalty of perjury, the following:

- a. VanillaSoft, by virtue of its status as a "pure reseller" does not have access to the necessary infrastructure to implement STIR/SHAKEN, and therefore has not implemented STIR/SHAKEN in the IP portions of its network.
- b. VanillaSoft's business name and primary address are as follows:

VanillaSoft Inc.
1011 S Congress Ave,
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Austin, TX, 78704

- c. VanillaSoft, Inc. has one dba: VanillaSoft.
- d. The above-listed business names are the only previously used business names.
- e. The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- f. VanillaSoft's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- g. The persons and entities that have 10% or more ownership interest in VanillaSoft are: (a) Tritium Partners, David Hood; (b) Chris Steiner, David Hood, Louis Summes; (c) VanillaSoft Corp; and (d) VanillaSoft Intermediate & VanillaSoft Holdings
- h. VanillaSoft has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- i. VanillaSoft is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- j. VanillaSoft is not required to, and does not have, an operating company number.


Paul McGee