

Vapi Voice AI Platform

Robocall Mitigation Plan

January 2025

Purpose

As a provider in the national telephone ecosystem, Vapi has a corporate interest and legal obligation to protect the operation of the national phone system and its customers. This Robocall Mitigation Plan documents the technical and operational measures that Vapi utilizes to discourage and mitigate robocall activity on its network.

Vapi operates as a VoIP based voice services platform that originates and processes calls over IP networks. Vapi provides SIP connectivity to its customers. PSTN interconnection and numbering resources are provided through upstream carrier partners. Vapi does not directly administer NANPA numbering resources.

Certification

In submitting this RMP with the FCC, Vapi states that: (a) all the calls it originates, carries or processes on its network are subject to this RMP. For purposes of this Plan, "originates" refers to VoIP calls initiated through the Vapi platform, and "processes" refers to real time audio handling and AI generated voice responses. Vapi does not function as a traditional intermediate or transit carrier; any PSTN termination is performed through interconnection with upstream carrier partners. (b) its prior certification has not been removed by Commission action and (c) it has not been prohibited from filing in the Robocall Mitigation Database ("RMD") by the Commission. Vapi's RMP, which has been uploaded into the RMD, reflects the "reasonable steps to mitigate illegal robocall traffic" and "a commitment to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use its service to originate, carry, or process illegal robocalls." Vapi states that during the past two years, it (and/or any entity for which Vapi shares common ownership, management, directors, or control) has not been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient RMD certification or mitigation program description.

Mitigation Measures

1. Customer Signup

During signup we verify the identity of the customer with the credit card issuer to ensure that a fake card is not being used. Vapi sales people also directly contact enterprise customers to vet them.

Vapi is integrated with Dodgeball (acq. Spreedly) to collect signals from the customer journey including device, browser, IP intelligence, mobile verification phone number, billing and payment information, and integrates Google for reCAPTCHA checks. These signals are used to inform a rules-based checkpointing system which blocks users that are flagged as fraud risks. Furthermore, Vapi is integrated with Veriff which enforces document verification as part of the KYC process. Accounts requesting elevated outbound call capacity are subject to additional review and monitoring.

2. Access

Vapi protects all of its services with Cloudflare WAF which prevents access from suspicious or high-risk IP ranges. We have rules in place to block traffic with a high threat score. For traffic that has a moderate threat score, we require a human to complete a challenge to verify they are not a bot.

3. Rate Limiting

Vapi uses Cloudflare Loadbalancing to rate limit traffic to our services. We restrict how many requests customers can send to our services during a given time window. Non-enterprise customers are limited to a maximum of ten outbound calls per day.

Outbound calling activity is subject to monitoring for anomalous traffic patterns, and Vapi may restrict, suspend, or terminate accounts exhibiting suspicious activity

4. Analytics and Monitoring

Vapi uses Intruder.io to continuously scan its domains for vulnerabilities and receive alerts whenever new vulnerabilities are discovered so they can be quickly patched or mitigated.

5. Incident Response

We participate in and act on reports from industry partners including the USTA Industry Traceback Group (ITG), and 382 Communications. Where applicable, call authentication and related network level controls are implemented in coordination with upstream carrier partners. Reports of Acceptable Use Policy (AUP) violations, including robocalls, are reviewed and responded to within 24 hours, as prescribed by our agreement with our carriers. Reports include those generated through automated internal or external analytics, as well as reports from individual users and customers. Vapi's contracts with its end users and upstream providers include AUP requirements subject to enforcement via automated analytics and manual review.

6. Third Party Analytics

Vapi does not use third party analytics vendors for outbound telephony; however as noted above Vapi does use the Dodgeball (acq. Spreadly) platform (<https://www.dodgeballhq.com/>) for customer validation at account creation and for account takeover detection/remediation, both of which are factors in robocall mitigation.

7. Training

Vapi has implemented a training program that focuses on personnel and their understanding of the Robocall Mitigation Plan. Specifically focusing on the onboarding of new customers/renewals and how to ensure that sales personnel understand the prerequisites for any new customer/renewal and how it supports the Robocall Mitigation Plan. The training focuses on instructing employees on illegal robocall concerns, traceback requests, and regulatory requirements.

8. Terms of Service

Vapi's services enable AI generated voice functionality. Customers are contractually required to comply with all applicable telemarketing, consent, caller identification, and anti spoofing laws, including those applicable to artificial or prerecorded voices. Vapi may suspend or terminate accounts engaged in unlawful robocall activity and will cooperate with upstream carriers and traceback entities in investigating and mitigating suspected violations.

Company, Principals and Affiliates

Legal Company Name

Vapi, Inc.

Principals

Jordan Dearsley, CEO

Nikhil Gupta, CTO

Affiliates

None

Employee Responsible for Addressing Robocall Mitigation

FCC, ITG, and law enforcement agencies:

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Revision History

Description	Revision Date
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