

V2World Telecom

Robocall Mitigation Plan

V2World Telecom is committed to complying with the Federal Communications Commission (FCC) regulations under 47 C.F.R. § 64.6305 to mitigate and eliminate the origination of illegal robocalls on its network. This document outlines V2World Telecom's current policies and procedures designed to reduce or eliminate outbound illegal robocalls originating on its network. V2World Telecom Company undertakes to take "reasonable measures" and responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

1. CUSTOMER CONTRACT AND COMPLIANCE REQUIREMENTS

All customer agreements with V2World Telecom explicitly forbid the transmission of illegal robocalls through our switches or networks. They also outline specific requirements for ASR, LCD, and other traffic statistics, with violations leading to immediate termination of service. V2World Telecom mandates that all customers furnish accurate and valid information regarding their business, including physical address, contact personnel, state or country of incorporation, federal tax identification number, or non-U.S. government identification. Additionally, customers must reveal the nature and practices of their business. We strive to understand the exact type of traffic generated from each customer's switch, including the demographics of their clientele and the specific services they offer. The vetting process at V2World Telecom is designed to assess the legitimacy of a customer to establish a service relationship.

2. MONITORING AND TRACEBACK

V2World Telecom monitors its system diligently and will investigate any suspicious traffic. When we detect suspicious traffic, we will immediately take appropriate actions to ensure that it is legitimate. In the event V2World Telecom receives a traceback request for an illegal robocall, we act on it immediately, request a specific and detailed explanation from our customer(s) and insist on immediate corrective action. If the customer fails to take timely corrective action, V2World Telecom will immediately terminate services and escalate the matter to law enforcement authorities. To allow for timely and comprehensive law enforcement response efforts against illegal robocallers, V2World Telecom will dedicate sufficient resources to promptly complete and provide responses to all traceback requests received from the FCC, law enforcement and/or the ITG, and commits to fully responding to any traceback.

3. INTERNATIONAL CALL ORIGINATORS

V2World Telecom is not currently an international voice services provider. If at any time the V2World Telecom does sell its services to customers which are international call originators using North American Numbering Plan resources it will familiarize itself with and develop best practices for fully vetting such customers and performing telephone number validation on all international originated calls.

4. CALL BLOCKING AND VALIDATION

V2World Telecom blocks all calls originating from numbers known to us to send illegal robocall traffic and/or calls destined to specific phone numbers as appropriate for robocall mitigation. V2World Telecom enforces telephone number validation procedures, for: (1) single line voice service subscribers, both services connected via TDM or IP, the switching equipment has been set up to only accept calls from the number assigned to that subscriber; and (2) subscribers with multi-line telephone systems, for both services connected via TDM or IP, the Provider screens all originating calls and only allows calls to be connected if the originating number matches one of the numbers assigned

to the subscriber. These screening capabilities enable an automated and secure method of validating originating telephone numbers.

5. LAW ENFORCEMENT COOPERATION

V2World Telecom cooperates fully with investigative authorities, industry traceback groups, the FCC and the official consortium designated to lead private traceback efforts. We have a single contact individual designated to handle all traceback requests and coordinate with outside investigations.

6. CONTINUOUS IMPROVEMENT MEASURES

To ensure ongoing alignment with regulatory requirements and industry advancements, V2World Telecom implements the following continuous improvement measures: (1)V2World Telecom conducts regular reviews of call detail records (CDRs) to detect anomalies. (2)V2World Telecom proactively updates its call-blocking databases and third-party tools while conducting annual audits to refine mitigation strategies, ensuring alignment with evolving FCC regulations and industry best practices. (3)V2World Telecom conducts annual evaluations of the Robocall Mitigation Plan's effectiveness, refining strategies as needed to address emerging fraud tactics and ensure compliance with evolving FCC regulations and industry standards.