

Robocall Mitigation Plan

Business Information

Vaco, Inc.
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Contact Information

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Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (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

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

Vaco does not assign telephone numbers to its customers and does not allow robocalling functionality.

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 Vaco in which we transmit, originate, and/or terminate calls based on behalf of the subscriber.

Vaco's KYC program involves obtaining specific subscriber information when payment is made for services. This process includes collecting such information such as:

- physical business location;
- contact person(s);
- nature of the customer's business.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls, and 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, 38 FCC Rcd 5404 (2023), Vaco provides the following information concerning its upstream voice service carrier.

Vaco has one upstream provider from which it receives voice traffic:

Inteliquent, Inc. d/b/a Sinch
9081 Paysphere Circle
Chicago, IL 60674-0001
Kyle McGinnis
Kyle.McGinnis@sinch.com

Vaco has a master service agreement with its upstream provider and has received assurances in writing from its officials that it has, and will continue to, sign calls transmitted to Vaco and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to Vaco. Vaco and its upstream provider have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

Vaco maintains an AUP that subscribers must sign before being permitted to use Vaco's network. Among other things, the AUP prohibits:

- using or allowing others to use the Vaco Services in any manner that is in violation of any applicable federal, state, local or international laws, rules or regulations;
- using the Vaco Services to promote or engage in any illegal activity that violates or infringes upon the rights of any person;
- transmitting any communication using the Vaco Services in violation of any applicable law or regulation is strictly prohibited (this includes transmitting any material that is protected by copyright, trademark or other intellectual property right that is used without authorization).
- sending unsolicited bulk emails or any type of electronic communication that the recipient did not directly request from the sender
- sending any type of communication to any individual who has indicated that he/she does not wish to receive messages from the customer.

Vaco's contractual terms with subscribers specify that Vaco may take action up to suspension or termination of service for violation of the AUP.

Mitigation During Service

Vaco works with its upstream provider to ensure that all subscribers can report any suspicious call connected through their account and measures are set to prevent future calls from/to that individual numbers for all subscribers (none routed by the platform from that moment on - blacklisting). These features are:

- VoIP-originated calls are signed with subscriber caller ID only after number validation via SMS; and
- requiring authentication to initiate any call, or a whitelist of originating numbers that is under customer's control.

Analytics for Monitoring Traffic

Vaco works with its upstream provider to identify behaviors which indicate illegal call activity. Examples of calling patterns monitored:

- anomalies in cost generated by calls from a single customer;
- multiple overlapping calls on the same account is a risk of not having a single subscriber using the service;
- velocity on initiate calls (synchron intervals, quick dialing back-to-back calls);
- recent volumes (last 60 min) vs weekly trends;
- number of unique destination numbers in a time frame (total account level);
- number of unique source numbers in a time frame (total and account level); and
- anomalies in call duration distribution (most calls having similar duration is not representative for residential service usage).

Investigate Suspicious Activity

When traffic analysis indicates the presence of likely illegal robocalling, Vaco works with its upstream provider to follow defined procedures on investigating such subscribers.

The procedures established include but are not limited to:

- checking recent and past call detail records and benchmark against expected trends;
- checking recent and past account activity and purchases;
- investigating if any system issue generates the strange behavior;
- verifying that the call originating path is valid; and
- contacting the subscriber to understand his particular use case and validate that the activity belongs to that subscriber.

Because Vaco does not have the infrastructure to implement STIR/SHAKEN, no third-party vendors are involved in Vaco's analytics.

Vaco follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, Vaco will devote sufficient resources to provide prompt and complete resources to traceback requests. Vaco commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the

industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Vaco works with its upstream provider to investigate suspicious activity found by the carrier's monitoring systems or reported to Vaco by subscribers or third parties. The investigation could potentially result in opening a traceback request or with Vaco contacting a subscriber to correct improper use of the applicable platform, or, if the subscriber does not respond or comply, to notify its upstream provider to block their use of the platform.

For all new and renegotiated Vaco contracts governing the transport of voice calls, Vaco will endeavor to contractually require Vaco's subscribers to cooperate in traceback investigations by identifying the upstream provider from which the suspected illegal robocall entered our network.

Blocking

Vaco will implement Do Not Originate requests it receives from ITG. Vaco's upstream provider has mechanisms to automatically block suspicious calls using internal analytics. If Vaco and/or its upstream carrier identifies suspected robocalling patterns that are confirmed with further investigation, Vaco will take appropriate action which may include suspending or terminating the subscriber's use of Vaco's service. Vaco will cooperate with Investigative Bodies (provide a single point of contact to address traceback requests from law enforcement (including the state attorney general's office), as well as the FCC, and/or ITG; as well as documenting requests & actions taken in response thereto.

Plan Updates

This plan, along with industry best practices, will evolve to response to the dynamic nature of mitigating illegal robocalling. Vaco will monitor industry best practices and continuously improve our internal processes to ensure this plan, and our system adapts to this ever-changing issue.

In the event of any material change to this plan, Vaco 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 Connie Binyon

I, Connie Binyon, Secretary of Vaco, Inc. ("Vaco"), do hereby certify, under penalty of perjury, the following:

- (1) Vaco, 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.
- (2) Vaco 's Business name and primary address are as follows:

Vaco, Inc.
146 N San Fernando BLVD
#202
Burbank, CA 91502
- (3) Vaco uses the business name Vaco Communications.
- (4) Vaco has not previously used any other business name.
- (5) Vaco Inc. has a sole 10%+ owner and principal – Joseph Preston. Mr. Preston has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) Vaco has no subsidiaries or affiliates.
- (7) 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.
- (8) Vaco's role in the call chain is that of a voice service provider without a STIR/SHAKEN obligation.
- (9) Vaco has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (10) Vaco is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (11) Vaco is not required to have and does not have an operating company number.

/Connie Binyon/

Connie Binyon

Date: February 27, 2026