

Voicr Robocall Mitigation Program Description

Company Name: Voicr Telecomunicações do Brasil LTDA

FRN: 0036919926

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1. Introduction and Commitment

Voicr Telecomunicações do Brasil LTDA is deeply committed to combating the growing problem of illegal robocalls and protecting the integrity of the communications network for our customers and partners. This document details our comprehensive robocall mitigation program, developed in full compliance with the Federal Communications Commission (FCC) regulations, including Section 64.6305 of Title 47 of the Code of Federal Regulations (47 CFR § 64.6305). By certifying Full STIR/SHAKEN Implementation, we affirm that we employ the most robust measures available to authenticate calls and mitigate illegal traffic. Our program is dynamic, adapting to the evolved tactics of illegal callers and regulatory guidance.

2. Full STIR/SHAKEN Implementation

Voicr Telecomunicações do Brasil LTDA has completed the full implementation of the STIR/SHAKEN call authentication framework across our IP-based network. This framework allows for the digital signing of outbound calls and the verification of signatures on inbound calls, providing a level of trust in the caller's identity.

- **Implementation Status:** STIR/SHAKEN is fully operational in all parts of our network that originate, carry, or process voice traffic. We have implemented the ATIS-1000074 standard for STIR/SHAKEN.
- **Governance Authority:** We are associated with **ANATEL, ABR TELECOM & Telefônica Brasil S/A** for obtaining and managing necessary certificates. These entities serve as our exclusive governance authority for STIR/SHAKEN certificate management.
- **Signing Process (for originated calls):** All calls originated on our network are digitally signed using valid certificates obtained through our associated Governance Authority. We apply the appropriate attestation level (A, B, or C) based on our knowledge of the relationship between the caller and the originating telephone number, as required by FCC rules and in accordance with 47 CFR § 64.6306. Attestation levels are assigned as follows:

- Attestation A: Assigned when we have a direct authenticated relationship with the customer and have verified their right to use the calling number.
- Attestation B: Assigned when we have an indirect relationship with the customer but have authenticated the call origination point.
- Attestation C: Assigned when we have no direct or indirect relationship with the customer and cannot authenticate the call origination.
- **Verification Process (for received calls):** We have implemented STIR/SHAKEN verification functionality for all received calls. We validate the STIR/SHAKEN signatures present in call headers to determine the authenticity of the Caller ID information. We use a Session Border Controller (SBC) from Acme Packet (Oracle) to perform the verification of the STIR/SHAKEN signatures.
- All calls originated on our network, subject to our Full STIR/SHAKEN Implementation certification, are in full compliance with the applicable requirements in 47 CFR § 64.6301(a)(1) and (2) (for Voice Service Providers) or 47 CFR § 64.6302(b) (for Gateway Providers) or 47 CFR § 64.6302(c) (for Non-Gateway Intermediate Providers), as applicable to our provider category.

3. Reasonable Steps to Avoid Illegal Robocall Traffic

In addition to full STIR/SHAKEN implementation, our robocall mitigation program includes a range of proactive and reactive measures to identify and prevent illegal traffic:

- **Real-time Traffic Monitoring:** We utilize advanced traffic monitoring systems, specifically the **Vivo RMC system** and **Voipswitch STIR/SHAKEN system**, that analyze call patterns in real-time to detect suspicious activity, such as:
 - High volumes of short duration calls.
 - Sequential or random dialing patterns.
 - Use of unallocated or invalid telephone numbers as Caller ID.
 - Calls to lists of numbers known to be frequent targets of robocalls.
 - Discrepancies between the presented Caller ID and the actual call origin (beyond STIR/SHAKEN verification).
 - We monitor key metrics such as calls per second, call completion rates, and average call duration. Alerts are triggered when these metrics exceed predefined thresholds, which are dynamically adjusted based on historical traffic patterns and known robocalling signatures.
- **Complaint and Feedback Analysis:** We collect and analyze complaints from customers, reports from other providers, data from the FCC's complaint database, and information from the industry traceback consortium. These sources of feedback are crucial for identifying emerging sources of illegal traffic.

We actively participate in the **ABR TELECOM Traceback Technology**([Qual Empresa Me Ligou](#)).

- **Customer Vetting Process (if applicable):** For business and wholesale customers, we maintain a rigorous vetting process to assess the risk associated with their call traffic. This may include verifying business information, compliance history, and the nature of expected traffic.
 - We require new business and wholesale customers to provide the following documentation:
 - Business registration documents.
 - Proof of identity of the business owner or authorized representative.
 - A detailed description of their intended calling practices, including types of calls, calling volumes, and target audiences.
 - We verify the provided business information through independent sources, such as state business registries. We also conduct checks for any history of robocalling violations or complaints.
 - We continuously monitor customer traffic for deviations from their stated calling practices and investigate any anomalies.
- **Telephone Number Management and Spoofing Prevention:** We implement controls to ensure that telephone numbers used as Caller ID are legitimate and associated with the caller. We take steps to prevent the illegal spoofing of numbers. We utilize the [Qual Empresa Me Ligou](#) database to validate the legitimacy of telephone numbers. We also employ call pattern analysis to detect and flag calls with suspicious Caller ID usage.
- **Collaboration with Other Providers:** We actively participate in industry initiatives and collaborate with other voice service providers to share information about illegal traffic and emerging tactics.
- **Response to Notifications and Alerts:** We have established procedures to promptly respond to notifications and alerts of potentially illegal traffic originating from or transiting our network received from the FCC, law enforcement, the traceback consortium, and other industry partners.
 - Our internal escalation protocol involves immediate notification of our network operations center and legal team.
 - We aim to acknowledge and begin investigating alerts within 2 hours of receipt.
 - We use the Pipefy ticketing system to track and manage all alerts and investigations.
- **Blocking of Identified Illegal Calls:** Based on traffic analysis, complaints, and external information, we implement call blocking to mitigate identified illegal traffic. Our blocking procedures are designed to be accurate and avoid

inadvertent blocking of legitimate calls. It is our priority to ensure that emergency calls to 911 and other government emergency numbers are never improperly blocked. We utilize a dynamic blocking system that allows us to block calls based on various criteria, including:

- Source IP address.
- Calling number patterns.
- Call duration.
- Complaint rates.
- We maintain a whitelist of emergency numbers to ensure they are never blocked. We also have procedures in place to regularly review and update our blocking lists to minimize the risk of blocking legitimate traffic.

4. Response to Traceback Requests

Voicr Telecomunicações do Brasil LTDA recognizes the critical importance of cooperation in traceback efforts to identify and stop illegal robocallers. We have a firm commitment to respond fully and promptly to all traceback requests from the FCC, law enforcement, and the industry traceback consortium.

- **Response Commitment:** We will respond to all traceback requests within 24 hours of receipt.
- **Designated Traceback Point of Contact:** Our designated point of contact for traceback requests is:
 - Name: Everson Costa
 - Title: Senior Telecommunications Engineer
 - Department: Telecommunications
 - Phone: +551144500902
 - Email: traceback@voicr.com
 - Alternative Contact: everson.costa@voicr.com
- **Internal Traceback Processes:** We maintain call records and relevant metadata, as permitted and required by law, to facilitate the traceability of calls through our network. We have internal procedures to quickly investigate call paths and provide the requested information to traceback entities.
 - We retain call detail records (CDRs) for a period of 18 months. These records include information such as:
 - Call origination and termination points.
 - Call timestamps.
 - Call duration.
 - Caller ID information.
 - We use a secure database with access controls to protect the confidentiality

and integrity of call records.

- Our traceback process involves using specialized tools to analyze call logs and identify the origin and path of suspicious calls. We have a dedicated team available 24/7 to respond to traceback requests.

5. Training and Compliance

We ensure that our relevant personnel are adequately trained on robocall mitigation procedures, FCC regulations, and the operation of STIR/SHAKEN and traffic monitoring systems. Compliance with our mitigation program is a priority for all employees involved in network operations and customer service.

- All network operations and customer service personnel receive mandatory training on robocall mitigation upon hiring and annually thereafter.
- Training is conducted through a combination of online modules, in-person workshops, and regular updates on FCC regulations and industry best practices.
- Training materials cover topics such as:
 - FCC robocalling rules and regulations.
 - STIR/SHAKEN implementation and operation.
 - Traffic monitoring systems and alert procedures.
 - Customer complaint handling.
 - Traceback procedures.
- Employee comprehension of training is verified through quizzes and practical exercises.

6. Program Updates and Maintenance

Our robocall mitigation program is reviewed and updated regularly to reflect changes in the threat landscape, new mitigation technologies, and any updates to FCC regulations. We are committed to keeping our certification in the RMD accurate and current.

- The robocall mitigation program is formally reviewed and updated at least quarterly.
- The review process involves a cross-functional team including representatives from network operations, legal, compliance, and customer service.
- Updates are documented and communicated to all relevant personnel.
- Version control is maintained for all program documentation.

7. Conclusion

Voicr Telecomunicações do Brasil LTDA certification of Full STIR/SHAKEN Implementation, coupled with the measures detailed in our robocall mitigation

program, demonstrates our proactive and comprehensive commitment to combating illegal robocalls. We will continue to work diligently to protect the communications network and ensure that our services are not used for fraudulent or abusive activity.