

Robocall Mitigation and STIR/SHAKEN Implementation Plan for Vital ECommunication

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1. Introduction and Commitment

Vital ECommunication is a voice service provider committed to protecting its customers and the public from the harms of illegal robocalls. We are dedicated to ensuring the integrity of our network and proactively preventing its use for transmitting illegal or fraudulent call traffic. This document outlines our comprehensive plan to mitigate illegal robocalls and details our approach to implementing the STIR/SHAKEN framework, in compliance with the rules and regulations set forth by the Federal Communications Commission (FCC).

2. Officer Responsible for Robocall Mitigation

The individual responsible for overseeing and implementing this robocall mitigation program is:

- **Name:** Ciro Vitale
- **Title:** Chief Executive Officer (CEO)
- **Contact Email:** ceo@vitalecommunication.com
- **Business Address:** 49415 Card Road, Macomb, MI 48044, USA

3. STIR/SHAKEN Implementation Plan

As a voice service provider, Vital ECommunication commits to fully implementing the STIR/SHAKEN framework to authenticate and verify caller ID information for IP-based calls.

- **Implementation Status:** Vital ECommunication is actively working with its upstream voice partners (including Infobip) to implement a robust STIR/SHAKEN solution. We will leverage the capabilities of our underlying carriers to ensure that all calls originating from our platform are signed with the appropriate attestation level before being passed to the public telephone network.
- **Attestation Levels:** We will be responsible for assigning the correct attestation level to calls originating from our customers:
 - **Full Attestation (A):** We will provide 'A' level attestation for calls where we can verify the customer's identity and their right to use the associated telephone number (e.g., numbers purchased directly through our platform).
 - **Partial Attestation (B):** We will provide 'B' level attestation for calls where we have authenticated our customer but cannot verify their right to use the calling number.
 - **Gateway Attestation (C):** We will provide 'C' level attestation for calls originating from international gateways or other sources where the call's origin cannot be verified.

4. Robocall Mitigation Program

In addition to STIR/SHAKEN, Vital ECommunication employs a multi-layered mitigation program to combat illegal robocalls. This program includes the following measures:

- **Know Your Customer (KYC):** We will implement a reasonable KYC process to verify the identity of our business customers, particularly those using Toll-Free Numbers (TFNs). This helps prevent bad actors from accessing our platform.
- **Traffic Monitoring:** Our system, in conjunction with our upstream partners, will monitor call traffic for suspicious patterns indicative of robocalling. This includes, but is not limited to:
 - Unusually high volumes of outbound calls from a single account.
 - A large number of short-duration calls.
 - High volumes of unanswered calls.
 - Sequential dialing patterns.
- **Blocking and Notification:** We will promptly investigate any identified suspicious activity. If an account is confirmed to be transmitting illegal robocalls, we will take immediate action, which may include suspending or terminating the account and blocking the associated numbers.
- **Cooperation with Authorities:** Vital ECommunication is committed to cooperating fully with the FCC, law enforcement, and the industry Traceback Consortium. We will respond in a timely manner to all legal requests and traceback inquiries related to suspected illegal robocalling on our network.

5. Commitment Statement

Vital ECommunication hereby certifies that it will not knowingly originate, carry, or process illegal robocall traffic. We are committed to maintaining and updating this mitigation plan as technology and regulations evolve to ensure a safe and trustworthy communication environment for all.