

Robocall Mitigation Plan

Company Name: Virtual 3, LLC

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Services Provided: Retail and Wholesale Voice Services

STIR/SHAKEN Status: Currently working to obtain STIR/SHAKEN certification

1. Introduction

Virtual 3, LLC provides both retail and wholesale voice services. While the company is actively working to complete STIR/SHAKEN implementation and certification, it recognizes its obligation to prevent the origination of illegal robocalls on its network. This Robocall Mitigation Plan outlines the policies, procedures, and monitoring controls Virtual 3, LLC uses to identify, reduce, and prevent unlawful robocall traffic.

2. STIR/SHAKEN Implementation

Virtual 3, LLC is in the process of completing STIR/SHAKEN certification and implementation. Once fully implemented, STIR/SHAKEN will be applied to all SIP traffic within its IP networks wherever technically feasible. Until certification is finalized, Virtual 3, LLC is using robocall mitigation practices as outlined below.

3. Robocall Mitigation Practices

a. Call Authentication and Screening

All retail and wholesale customers are subject to identity verification (KYC) and usage monitoring before being allowed to originate traffic. Virtual 3, LLC does not allow anonymous or unverified customers to place calls. Call traffic patterns are continuously monitored for abnormal behavior, including high call volumes, short call durations, or sequential dialing patterns.

b. Customer Vetting and Contracts

All customers must complete a thorough vetting process prior to service activation. Customer contracts include explicit prohibitions on illegal robocalls and fraudulent call traffic. Violations result in immediate suspension or termination of service.

c. Traffic Monitoring and Analytics

Calls are monitored in real-time for signs of auto-dialing or robocall activity. Alerts are generated when suspicious patterns are detected, triggering manual review by compliance staff. Reports are filed with the FCC and traceback requests from the Industry Traceback Group (ITG) are promptly answered.

d. Complaint Handling and Traceback Cooperation

Virtual 3, LLC fully cooperates with traceback investigations. Complaints are logged, investigated, and resolved quickly, with offending traffic sources blocked when necessary. Direct communication is maintained with upstream and downstream providers to address and mitigate suspicious activity.

4. Ongoing Commitment

Virtual 3, LLC is committed to completing STIR/SHAKEN certification and continuing to enhance its robocall mitigation program. Policies are reviewed regularly to ensure compliance with FCC regulations and industry best practices.

5. Certification

I, Alberto Dominguez, certify that Virtual 3, LLC has implemented the practices described above and will continue to monitor and prevent unlawful robocalls to the best of our technical and operational ability.

Contact:

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