

## **Robocall Mitigation Program Description**

### **& STIR/SHAKEN Implementation Exemption Request – Small Voice Service Provider**

**Filing Entity:** ValuecomCorporation

**FCC Registration Number (FRN):** 0037442431

**Filing Role:** Voice Service Provider

## **Introduction and Commitment**

ValuecomCorporation is a small voice service provider with less than 10 clients committed to protecting consumers from illegal robocalls and to maintaining the integrity of the public telephone network. We acknowledge our responsibility to prevent the origination of illegal robocall traffic on our network.

However, we do not have the technical capability to implement the STIR/SHAKEN framework at this time.

This document describes our Robocall Mitigation Program, which outlines the specific, reasonable steps we have taken to fulfill our obligations under 47 CFR § 64.6305.

## **Mitigation Measures:**

### **1. Customer Vetting and Onboarding (Know Your Customers)**

We implement a rigorous customer onboarding and vetting process designed to prevent the origination of illegal robocalls. This process includes, but is not limited to, the following steps:

- **Verification:** We verify the business name, physical address, and contact information of all new and renewing customers. For commercial accounts, we validate the company's identity and its business type to ensure they have a legitimate need for our services.
- **Telephone Number Validation:** We confirm that our end-user customers have a legitimate and verifiable association with the telephone numbers they use for their originating calls.
- **Service and Traffic Profile Assessment:** During the onboarding process, we review each business client's specific use case and intended use of our services, including

the expected volume, duration, and nature of their outbound calling traffic. We provide all necessary technical tools and solutions for them to use our managed services effectively and compliantly. This baseline helps us to identify any unusual or non-compliant traffic patterns in the future.

- **Customer Control:** All end-users are directly managed and known to us; no third-party customers are permitted. We do not allow the origination of externally-sourced traffic on our network. All traffic is generated by our business end-users, and is subject to our comprehensive vetting and monitoring processes. Also, we do not allow end-users to use any random Caller IDs to outbound calls. All used Caller IDs are vetted and permitted
- **Equipment Provisioning:** All voice equipment and solutions are deployed and managed by us.

## 2. Acceptable Use Policy (AUP) Enforcement

Our service agreements and an explicit Acceptable Use Policy (AUP) prohibit customers from originating illegal, fraudulent, or abusive traffic, including illegal robocalls. Our program includes the following measures to enforce this policy:

- **Proactive Notification:** We proactively inform our customers of their obligations under our AUP and the FCC's rules.
- **Monitoring and Suspension:** We continuously monitor customer traffic for potential violations of the AUP. If a customer is found to be originating illegal robocalls, our policy allows for immediate suspension or termination of their services. In most cases, we provide notice to the customer before taking action, but we reserve the right to act without notice to prevent harm to the network or to consumers.

### 3. Call Analytics and Monitoring

To detect and identify potential illegal robocall traffic, we utilize a combination of end-user software/hardware control in junction with live traffic monitoring analysis. We certify that all calls originating on our network are subject to this robocall mitigation program.

- **Software/Hardware Control:** we only allow traffic originated from our own software/hardware equipment. That ensures the legitimacy of Caller ID usage as well as human-originated call traffic.
- **Real-time monitoring:** We monitor our traffic in real-time, detect and investigate any unusual traffic patterns to identify patterns commonly associated with illegal robocalls, such as high call volumes from single numbers, short-duration calls, and anomalous calling times.

### 4. Traceback Cooperation

Valuecom Corporation is fully committed to cooperating with all regulatory and law enforcement efforts to combat illegal robocalls. We hereby affirm our commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement agencies, and the industry traceback consortium. We will continue to provide complete, accurate, and timely information to assist in these investigations.

### 5. Know Your Upstream Providers

As a voice service provider, we also maintain a thorough understanding of our upstream providers. Our procedures to know our upstream providers include:

- **Database Verification:** We verify that our upstream providers are registered and have a valid filing in the Robocall Mitigation Database before accepting any traffic from them. We will also check our upstream provider's compliance with FCC rules to ensure their filing has not been removed or flagged as deficient.
- **Contractual Obligations:** Our contracts with upstream providers include specific language requiring their compliance with all relevant FCC robocall mitigation rules.
- **Regular Communication:** We maintain regular communication with our upstream providers to ensure they continue to meet their mitigation and authentication obligations.

## **6. STIR/SHAKEN Implementation Status**

We do not have the technical capability to implement the STIR/SHAKEN framework at this time.

We are reliant on our upstream carrier for call authentication.