

ROBOCALL MITIGATION PLAN

Company Name: VNOXTEL LLC
FRN: 0037432507

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Company Status

VNOXTEL LLC is a telecommunications company currently completing carrier onboarding, regulatory compliance requirements, network configuration, and service deployment activities prior to commencing full commercial operations.

As of the date of this filing, VNOXTEL LLC has not commenced full-scale commercial voice operations and is not currently originating, terminating, or transiting significant volumes of customer voice traffic.

The company has established and implemented the policies, procedures, and compliance controls outlined in this Robocall Mitigation Plan in preparation for and during the launch of telecommunications services.

STIR/SHAKEN Implementation Status

VNOXTEL LLC has **implemented STIR/SHAKEN** in accordance with applicable FCC requirements and industry standards.

The company has completed the necessary onboarding and authorization processes associated with STIR/SHAKEN deployment, including the required industry registrations, OCN registration, STI-PA access, and STIR/SHAKEN certificate provisioning.

The company's STIR/SHAKEN certificate has been provisioned and implemented as part of its call authentication and robocall mitigation framework.

VNOXTEL LLC will use STIR/SHAKEN authentication and attestation procedures for applicable voice traffic in accordance with ATIS standards, STI-GA governance requirements, and applicable FCC regulations.

The company will continuously monitor its STIR/SHAKEN implementation and maintain the necessary credentials and certificates to support ongoing call authentication.

STIR/SHAKEN Attestation Framework

Full Attestation (A-Level)

VNOXTEL LLC will apply Full Attestation when it has a direct relationship with the customer, has verified the customer's identity, and has confirmed the customer's right to use the calling number.

Partial Attestation (B-Level)

VNOXTEL LLC will apply Partial Attestation when the source of the call can be authenticated but authorization to use the telephone number cannot be independently verified.

Gateway Attestation (C-Level)

Gateway Attestation may be applied where calls originate from sources for which caller identity or telephone number authorization cannot be fully verified.

The applicable attestation level will be determined based on the available customer, calling number, and traffic information and the company's applicable STIR/SHAKEN procedures.

Traffic Monitoring Procedures

VNOXTEL LLC will maintain monitoring and compliance controls designed to identify potentially unlawful or suspicious activity, including:

- Abnormal call volume spikes
- Excessive short-duration calls
- Sequential dialing patterns
- Auto-dialing indicators
- Caller ID anomalies
- Suspicious traffic behavior
- Potential spoofing activity
- Traffic inconsistent with the customer's approved business use

Automated alerts and compliance reviews may be utilized when unusual or potentially unlawful activity is detected.

Business Model & Network Role

VNOXTEL LLC intends to operate as a wholesale and business telecommunications service provider.

Planned services include:

- Wholesale Voice Services
- SIP Trunking
- Business Voice Communications
- Carrier Interconnection Services
- Telecommunications Platform Services

Because full commercial operations have not yet commenced, actual traffic volumes and customer distribution data are currently limited. Operational metrics and traffic classifications will be reviewed and updated as services become active.

Robocall Mitigation Program

VNOXTEL LLC has implemented the following policies and procedures to prevent illegal robocalls, caller ID spoofing, fraud, and unlawful telecommunications activity.

1. Know Your Customer (KYC) Procedures

Prior to service activation, customers may be required to provide:

- Business registration documentation
- Government-issued identification
- Tax identification information, where applicable
- Proof of authority for authorized representatives
- Information regarding the customer's intended use of telecommunications services
- Additional information necessary for compliance review

Enhanced due diligence may be conducted for higher-risk customers, industries, traffic patterns, or use cases.

Service may be denied, suspended, or terminated if customer information cannot be adequately verified.

2. Traffic Monitoring & Analytics

VNOXTEL LLC will monitor network traffic to identify potentially unlawful activity, including:

- Abnormal call volume spikes
- Excessive short-duration calls
- Sequential dialing patterns
- Auto-dialing indicators
- Caller ID anomalies
- Suspicious traffic behavior

- Potentially fraudulent traffic
- Traffic inconsistent with customer profiles or authorized use

Automated alerts and compliance reviews may be utilized when unusual activity is detected.

3. Call Blocking & Filtering

VNOXTEL LLC reserves the right to block, reject, suspend, restrict, or terminate traffic that appears fraudulent, spoofed, unlawful, or inconsistent with customer authorization.

Traffic may be restricted where:

- Caller ID spoofing is detected
- Illegal robocall activity is suspected
- Regulatory violations are identified
- Customer verification cannot be completed
- Traffic patterns indicate potential abuse
- Calling numbers or traffic sources cannot be adequately validated

4. Do-Not-Originate (DNO) Protection

VNOXTEL LLC intends to utilize available industry resources and internal controls to identify and block, where applicable:

- Invalid telephone numbers
- Unallocated numbering resources
- Spoofed caller IDs
- Numbers identified through applicable Do-Not-Originate programs
- Other numbers or traffic sources identified as inappropriate for origination

5. Traceback Cooperation

VNOXTEL LLC will cooperate fully with legitimate traceback requests from regulators, carriers, law enforcement agencies, and authorized industry traceback organizations.

The company will:

- Investigate traceback inquiries promptly
- Identify responsible customer accounts where applicable
- Preserve records relevant to investigations
- Provide available information to authorized parties
- Respond within applicable regulatory or industry timeframes

6. Upstream Provider Compliance

VNOXTEL LLC intends to utilize reputable and compliant upstream providers that maintain appropriate robocall mitigation programs and comply with applicable telecommunications requirements.

Preference will be given to providers that support STIR/SHAKEN implementation, traceback cooperation, caller ID authentication, and applicable regulatory compliance requirements.

7. Customer Compliance & Enforcement

All customers will be required to comply with applicable:

- FCC regulations
- Telephone Consumer Protection Act (TCPA)
- Telemarketing Sales Rule (TSR), where applicable
- Do-Not-Call requirements
- Company Terms of Service
- Acceptable Use Policy
- Applicable federal and state telecommunications requirements

Violations may result in:

- Immediate suspension
- Traffic blocking
- Service termination
- Customer account termination
- Reporting to appropriate authorities where required

8. Record Retention

VNOXTEL LLC will maintain records necessary for compliance, customer verification, and traceback purposes, including:

- Customer onboarding documentation
- Service agreements
- Call Detail Records (CDRs)
- Calling number information
- Compliance investigation records
- Relevant traceback documentation

Records will be retained for a minimum of two (2) years or longer where required by applicable law or regulation.

9. Regulatory Compliance

VNOXTEL LLC is committed to compliance with applicable FCC regulations relating to:

- Robocall mitigation
- STIR/SHAKEN call authentication
- Caller ID integrity
- Consumer protection
- Telecommunications operations
- Traceback cooperation

This Robocall Mitigation Plan will be reviewed periodically and updated as operations expand and regulatory requirements evolve.

Network Security & Traffic Controls

VNOXTEL LLC maintains policies and procedures designed to protect network integrity and prevent misuse of telecommunications services.

Where policy violations or suspicious activity are identified, the company reserves the right to:

- Suspend services immediately
 - Restrict or block traffic
 - Conduct compliance investigations
 - Require additional customer verification
 - Permanently terminate customer accounts
 - Cooperate with appropriate regulatory or law enforcement authorities where required
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STIR/SHAKEN Ongoing Compliance

VNOXTEL LLC will maintain its STIR/SHAKEN implementation on an ongoing basis.

The company will monitor certificate validity, authentication processes, attestation practices, and related credentials to ensure continued operation of the STIR/SHAKEN framework.

Any required certificate renewal, credential maintenance, or configuration updates will be completed in a timely manner to avoid interruption of STIR/SHAKEN functionality.

Certification

I certify that the information contained in this Robocall Mitigation Plan is true and accurate to the best of my knowledge and reflects the current operational and compliance status of VNOXTEL LLC.

Submitted By:

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