

VOX FABRIK ROBOCALL MITIGATION PROGRAM DESCRIPTION

Date: Sep 4, 2025

Company: Vox Fabrik

Service Type: Inbound IVR Voice Service Provider

FCC Registration Number (FRN): 0037467917

1. SERVICE OVERVIEW

Vox Fabrik operates as a retail voice service provider specializing in **inbound Interactive Voice Response (IVR) services**. Our platform enables businesses to receive and manage incoming calls through automated workflows.

Service Characteristics:

- **Primary Purpose:** Inbound call reception and IVR automation
- **Phone Number Usage:** 2-7 numbers per customer for business call reception
- **Transfer Capability:** Limited to customer-owned numbers or internal departments only
- **Upstream Provider:** BulkVS (wholesale carrier with full STIR/SHAKEN implementation)

2. ROBOCALL MITIGATION MEASURES

2.1 Preventive Controls

Acceptable Use Policy (AUP)

- All customers must read and explicitly agree to our comprehensive AUP before phone number provisioning
- AUP explicitly prohibits illegal robocalling, telemarketing, spam, and TCPA violations
- Clear statement that numbers are for inbound use only, not outbound campaigns

Know Your Customer (KYC) Procedures

- Collection of customer identification: legal name, business name, physical address
- Mandatory use case description for each phone number requested
- Email verification required for all accounts
- Documentation of customer agreement timestamps

2.2 Technical Controls

Call Pattern Monitoring

- Automated detection of suspicious patterns:
 - Calls under 6 seconds duration (robocall indicator)
 - Burst calling patterns (multiple calls in rapid succession)
 - High outbound-to-inbound call ratios
 - Excessive short-duration call rates

Usage Limitations

- Monthly minute caps for inbound calls
- Stricter limitations on outbound transfers
- Automatic suspension triggers for anomalous activity

2.3 Enforcement Actions

Immediate Suspension Triggers:

- Evidence of illegal robocalling activity
- TCPA violations or Do Not Call registry violations
- Call spoofing or caller ID manipulation
- Pattern matching known robocall behaviors
- Law enforcement or court orders

Progressive Enforcement:

- First violation: Warning and education
- Second violation: Temporary suspension pending review
- Third violation: Permanent termination and reporting to authorities

3. STIR/SHAKEN COMPLIANCE

Implementation Status

Vox Fabrik maintains **complete STIR/SHAKEN implementation** through our upstream provider BulkVS:

- 100% of originated calls are authenticated by BulkVS
- All call transfers include proper attestation levels
- No calls originate outside the STIR/SHAKEN framework

Authentication Framework

- **A-Level Attestation:** For calls using customer's verified numbers
- **B-Level Attestation:** For authorized transfers
- **Caller ID Integrity:** Strict verification that caller ID matches assigned numbers

4. TRACEBACK COOPERATION

Response Commitment

- **Response Time:** Within 24 hours of traceback request receipt
- **Designated Contact:** Compliance officer available during business hours
- **Emergency Contact:** 24/7 email monitoring for urgent requests

Information Provided

Upon valid traceback request, we provide:

- Customer account information
- Call detail records for specified timeframe
- Customer's provided use case and business information
- History of any prior violations or warnings

5. RECORD RETENTION

Data Retention Policy

- **Customer Records:** Minimum 2 years from account closure
- **Call Detail Records:** 2 years from call completion
- **Abuse Reports:** 3 years from incident date
- **Compliance Actions:** Permanent retention

Record Types Maintained

- Customer agreements and AUP acceptance
- Call logs with timestamp, duration, and parties
- Transfer destination verification
- Monitoring alerts and actions taken
- Traceback requests and responses

6. CONTINUOUS IMPROVEMENT

Regular Review Process

- Quarterly analysis of calling patterns and abuse trends
- Annual review of AUP effectiveness
- Ongoing updates to detection algorithms
- Industry participation in robocall mitigation initiatives

Metrics Tracked

- Number of abuse complaints received
- Suspension actions taken
- Traceback requests processed
- False positive rate in detection systems

7. COMPLIANCE CERTIFICATION

Vox Fabrik certifies that:

- This robocall mitigation program is actively implemented and enforced
- All calls originate through STIR/SHAKEN compliant pathways
- We maintain full cooperation with law enforcement and industry traceback efforts
- Our service is designed primarily for legitimate inbound business communications

8. CONTACT INFORMATION

Traceback Response Contact:

Name: Myles Ainley

Title: CEO

Email: contact@atm0srnd.com

Phone: 8704501195

Hours: Monday-Friday, 9 AM - 5 PM CT

Emergency Email: atm0srnd@gmail.com (monitored 24/7)

Legal/Regulatory Contact:

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This document represents Vox Fabrik's commitment to preventing illegal robocalling and maintaining compliance with all applicable FCC regulations, including the TRACED Act and associated rules. This program is reviewed quarterly and updated as needed to address emerging threats and regulatory requirements.

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Next Review Date: Sept 18, 2025