

Robocall Mitigation Plan

Company Name: Vendorflow, Inc.

Filing Type: Voice Service Provider without a STIR/SHAKEN obligation

Certification: No STIR/SHAKEN Implementation

1. STIR/SHAKEN Status

Pursuant to **47 CFR § 64.6301(a)**, a voice service provider is obligated to implement the STIR/SHAKEN authentication framework only if it operates its own IP networks that originate calls onto the PSTN. Vendorflow does not operate its own facilities-based IP interconnection.

All outbound calls from Vendorflow's customers are routed exclusively through its upstream wholesale provider, **Viirtue**, which has fully implemented STIR/SHAKEN and performs authentication and attestation on Vendorflow's behalf.

2. Robocall Mitigation Program

Vendorflow has implemented a robocall mitigation program consistent with **47 CFR § 64.6305(a)**. This program includes:

Customer Vetting and Onboarding

- Vendorflow verifies the identity of each customer before activating service.
- Customers must provide valid business information, including company registration and contact details.
- Vendorflow employs a multi-step vetting process, which may include validating business licenses, tax IDs, and conducting fraud screening.
- High-risk or unverified accounts are not permitted to originate calls.

Monitoring of Traffic Patterns

- Vendorflow actively monitors call traffic for suspicious patterns indicative of unlawful robocalling, such as high-volume short-duration calls or unusual call destinations.
- If suspicious activity is detected, Vendorflow takes prompt action, including suspending accounts or terminating service.

Traceback Cooperation

- Vendorflow responds fully and within 24 hours to traceback requests from the Commission, law enforcement, and the industry traceback consortium.
- Vendorflow also provides supporting information as necessary to aid in the rapid identification and mitigation of unlawful robocallers.

Ongoing Compliance

- Vendorflow continually reviews and updates its robocall mitigation practices to align with FCC requirements.
- Vendorflow educates customers on compliance obligations and prohibits the use of its services for unlawful robocalling.

3. Contact Information for Traceback Requests

Primary Contact:

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