

ROBOCALL MITIGATION PROGRAM

Voice Service Provider – Option 3: No STIR/SHAKEN Implementation

Submitted Pursuant to 47 CFR § 64.6305

1. PROVIDER INFORMATION

Provider Name:	Varayo Inc.
Provider Type:	Interconnected Voice over Internet Protocol (VoIP) Service Provider
Geographic Scope:	United States
Service Classification:	Originating voice traffic for business customers
Filing Date:	February 2, 2026
Authorized Representative:	Darrell Nelson, Chief Executive Officer

Varayo Inc. is a United States-based interconnected Voice over Internet Protocol (VoIP) service provider that originates voice traffic exclusively for verified business customers. At this time, Varayo Inc. has not implemented the STIR/SHAKEN authentication framework on any portion of its network infrastructure.

2. ROBOCALL MITIGATION PROGRAM OVERVIEW

Pursuant to 47 CFR § 64.6305(d)(2) and (3), Varayo Inc. maintains and enforces a comprehensive robocall mitigation program designed to prevent the origination of illegal robocall traffic on its network. This program represents the company's commitment to combating illegal robocalls and protecting consumers from unwanted and potentially harmful communications.

Our robocall mitigation program incorporates multiple layers of protection, including rigorous customer vetting procedures, continuous network monitoring, rapid response protocols, and full cooperation with regulatory and law enforcement authorities. The program is reviewed and updated periodically to address emerging threats and incorporate industry best practices.

3. CUSTOMER VETTING AND ONBOARDING CONTROLS

3.1 Business Customer Verification

Varayo Inc. provides services exclusively to verified business customers. We do not offer services to residential consumers or unverified entities. Prior to enabling outbound calling capabilities for any customer, Varayo Inc. implements the following verification procedures:

- **Business Entity Verification:** Verification of legal business registration through official government databases, including verification of EIN (Employer Identification Number) or other applicable business registration credentials.
- **Identity Authentication:** Collection and verification of identifying information for authorized representatives, including government-issued identification documentation.
- **Business Operations Review:** Evaluation of the customer's intended use case for voice services, including assessment of business model, calling patterns, and compliance with applicable regulations.
- **Know Your Customer (KYC) Compliance:** Comprehensive customer due diligence procedures that include verification of business address, contact information, and beneficial ownership information where applicable.
- **Service Agreement Execution:** Execution of detailed service agreements that include acceptable use policies, prohibited activities, compliance obligations, and enforcement provisions.

3.2 Prohibited Use Policies

All customers are required to comply with explicit prohibited use policies that forbid:

- Illegal robocalling or autodialing in violation of the Telephone Consumer Protection Act (TCPA)
- Caller ID spoofing in violation of the Truth in Caller ID Act
- Transmission of fraudulent, deceptive, or misleading communications
- Calls that violate federal or state Do-Not-Call regulations
- Any use of services for unlawful purposes or in violation of applicable regulations

4. NETWORK MONITORING AND TRAFFIC ANALYSIS

Varayo Inc. employs comprehensive monitoring practices to detect and prevent potentially illegal robocall activity on its network. These measures include both automated systems and manual review processes:

- **Call Volume Monitoring:** Real-time monitoring of call volumes per customer account to detect unusual spikes or patterns inconsistent with legitimate business use. Thresholds are established based on customer profile and historical usage patterns.
- **Call Pattern Analysis:** Analysis of calling patterns, including call duration, call frequency, geographic distribution, and time-of-day patterns, to identify characteristics associated with illegal robocalling campaigns.
- **Complaint Tracking and Investigation:** Systematic tracking and investigation of consumer complaints received directly or through third-party sources, including the FCC, Federal Trade Commission (FTC), and Industry Traceback Group.
- **Caller ID Authentication Monitoring:** Review of caller ID information for signs of spoofing or manipulation, even in the absence of STIR/SHAKEN implementation.
- **Industry Intelligence Integration:** Incorporation of threat intelligence from industry sources, including known bad actor lists, suspicious number ranges, and emerging robocall schemes.

5. MITIGATION AND ENFORCEMENT ACTIONS

Varayo Inc. maintains the capability to take prompt corrective action when illegal or suspicious robocall activity is detected or reported. Our enforcement framework includes graduated responses proportionate to the severity and nature of violations:

- **Immediate Suspension Authority:** Technical capability to immediately suspend or block outbound calling for any customer account upon detection of illegal robocall activity or receipt of credible evidence of violations.
- **Traffic Blocking:** Ability to block specific number ranges, calling patterns, or traffic types identified as associated with illegal robocalling.
- **Customer Notification and Investigation:** Procedures for notifying customers of suspected violations and conducting thorough investigations, including requiring customers to provide documentation of consent, compliance procedures, or other evidence of lawful calling practices.

- **Account Termination:** Termination of service for customers who engage in illegal robocalling, fail to remedy violations, or refuse to cooperate with investigations.
- **Documentation and Reporting:** Maintenance of detailed records of enforcement actions, customer responses, and outcomes for potential regulatory review or law enforcement investigations.

These enforcement mechanisms are designed to enable rapid response to potential violations while maintaining appropriate due process for legitimate business customers.

6. TRACEBACK COOPERATION COMMITMENT

Varayo Inc. commits to full and timely cooperation with all traceback efforts conducted by the Federal Communications Commission (FCC), law enforcement agencies, and the Industry Traceback Group (ITG). This commitment includes:

- **Traceback Response Protocol:** Designation of responsible personnel and establishment of procedures to respond promptly to traceback requests, typically within 24 hours of receipt.
- **Call Detail Record Retention:** Retention of call detail records and related information for a minimum period sufficient to support traceback investigations and regulatory requirements.
- **Information Sharing:** Provision of detailed information requested in traceback investigations, including customer identity, call routing information, and related technical data necessary to trace the origin of suspected illegal robocalls.
- **Upstream and Downstream Coordination:** Cooperation with both upstream providers (from whom we receive traffic) and downstream providers (to whom we deliver traffic) to facilitate comprehensive traceback efforts.
- **Corrective Action Implementation:** Prompt implementation of appropriate mitigation measures identified through traceback processes, including customer suspension or termination when warranted.

Varayo Inc. recognizes that effective traceback cooperation is essential to the industry-wide effort to combat illegal robocalls and holds itself accountable to the highest standards of responsiveness and transparency.

7. STIR/SHAKEN IMPLEMENTATION STATUS AND FUTURE PLANS

Varayo Inc. has not yet implemented the STIR/SHAKEN call authentication framework on its network. The company continues to evaluate technical and operational requirements for STIR/SHAKEN implementation and is monitoring regulatory developments, industry standards, and available implementation options.

While STIR/SHAKEN implementation is not currently in place, Varayo Inc. remains committed to:

- Ongoing assessment of technical requirements and implementation pathways for STIR/SHAKEN adoption
- Compliance with all applicable FCC regulations regarding robocall mitigation for providers that have not implemented STIR/SHAKEN
- Evaluation of partnerships with third-party providers or technology vendors that could facilitate STIR/SHAKEN implementation
- Monitoring of regulatory timelines and requirements that may necessitate STIR/SHAKEN adoption

Varayo Inc. recognizes that STIR/SHAKEN represents an important industry standard for call authentication and caller ID verification, and the company will continue to evaluate implementation as part of its ongoing network modernization efforts.

8. PROGRAM REVIEW AND CONTINUOUS IMPROVEMENT

Varayo Inc. reviews and updates its robocall mitigation practices periodically to ensure ongoing compliance with regulatory requirements and effectiveness in preventing illegal robocall traffic. This review process includes:

- **Annual Program Assessment:** Comprehensive annual review of all robocall mitigation policies, procedures, and controls to assess effectiveness and identify areas for improvement.
- **Regulatory Compliance Monitoring:** Ongoing monitoring of FCC regulations, guidance, and enforcement actions to ensure the program remains compliant with current requirements.
- **Industry Best Practices Integration:** Regular review of industry best practices, technical standards, and emerging technologies to enhance mitigation capabilities.
- **Performance Metrics Analysis:** Analysis of key performance indicators including complaint rates, enforcement actions taken, traceback response times, and other relevant metrics.
- **Documentation and Recordkeeping:** Maintenance of comprehensive documentation of program elements, changes, enforcement actions, and compliance activities.

Updates to this Robocall Mitigation Program will be filed with the FCC as required by applicable regulations.

9. CERTIFICATION

I, Darrell Nelson, Chief Executive Officer of Varayo Inc., hereby certify under penalty of perjury that I am an authorized representative of Varayo Inc., that I have read the foregoing Robocall Mitigation Program, and that the information contained herein is true, complete, and correct to the best of my knowledge, information, and belief.

Authorized Signature: _____

Printed Name: Darrell Nelson

Title: Chief Executive Officer

Company: Varayo Inc.

Date: February 2, 2026