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Robocall Mitigation Plan

VIP Datacom LLC

1. Company Identification and Role

VIP Datacom LLC operates as a **non-facilities-based VoIP reseller** utilizing a white-label upstream VoIP service provider.

VIP Datacom LLC:

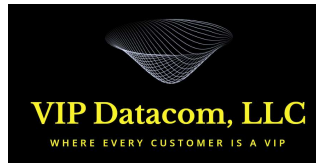
- Does not own, operate, or control switching, routing, signaling, or transmission facilities.
- Does not directly originate, route, or terminate traffic on its own network infrastructure.
- Relies on its contracted upstream provider for all network-level voice services.

This Plan is adopted in accordance with **47 C.F.R. § 64.1200(n)** and **47 C.F.R. § 64.6305**, the FCC's Robocall Mitigation Database requirements.

2. Scope of Responsibility

This Plan covers all robocall mitigation measures that are within the direct control of VIP Datacom LLC, including:

- customer onboarding and vetting,
 - contractual controls,
 - usage review,
 - complaint handling,
 - escalation to the upstream provider,
 - traceback cooperation.
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3. Reliance on Upstream Provider Network Controls

Because VIP Datacom LLC does not operate network infrastructure, it relies on its upstream provider to perform network-level robocall mitigation functions, including, where technically feasible:

- STIR/SHAKEN authentication and verification,
- call analytics and anomaly detection,
- traffic blocking and call labeling,
- support for traceback and law-enforcement requests.

VIP Datacom LLC contractually requires its upstream provider to maintain robocall mitigation and compliance practices consistent with FCC requirements and industry best practices.

4. Customer Vetting and Onboarding

Prior to enabling service, VIP Datacom LLC performs customer due diligence, which includes:

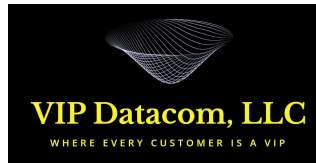
- legal business name and trade name (if applicable),
- physical business address,
- business registration or similar documentation,
- authorized user identity and contact information,
- description of the intended use of voice services,
- acknowledgement of compliance with the TCPA, FTC rules, and applicable state laws.

Enhanced review is applied to higher-risk use cases, including:

- outbound calling campaigns,
- telemarketing or lead-generation activities,
- political or survey calling,
- automated or high-volume calling.

VIP Datacom LLC may deny service when:

- the customer's identity cannot be reasonably verified,
- the proposed use case is unclear or inconsistent with lawful calling,
- credible risk indicators or adverse information are identified.



5. Contractual and Acceptable Use Controls

All customers of VIP Datacom LLC must agree to an Acceptable Use Policy that prohibits:

- illegal robocalls,
- unlawful telemarketing,
- caller ID spoofing or misleading caller ID practices,
- use of numbers without proper authorization,
- violations of the TCPA, FTC rules, FCC rules, or state consumer-protection laws.

Customer agreements require customers to:

- maintain appropriate consent and compliance records,
- cooperate with investigations and traceback requests,
- respond promptly to compliance inquiries.

6. Monitoring and Detection (Within Reseller Capabilities)

Although VIP Datacom LLC does not control the network, it monitors and reviews activity available through its reseller systems, including:

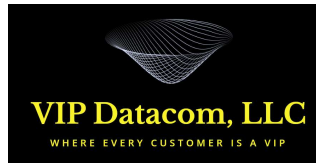
- customer usage volumes,
- abnormal calling patterns,
- complaint data received from consumers, carriers, regulators, or industry partners.

When suspicious or anomalous behavior is identified, VIP Datacom LLC initiates an internal compliance review and coordinates with its upstream provider as needed.

7. Escalation and Mitigation

If VIP Datacom LLC reasonably suspects illegal or unlawful robocalling:

1. The affected customer account may be restricted or suspended immediately.
2. The activity is escalated to the upstream provider for network-level analysis and blocking where appropriate.
3. The customer is contacted and required to provide explanations and supporting documentation.
4. Service may be permanently terminated if violations are confirmed or if the customer fails to cooperate.



8. Traceback and Law-Enforcement Cooperation 47 CFR 64.6305 (a) (2)

VIP Datacom LLC commits to cooperate promptly and in good faith with:

- the Industry Traceback Group,
- the FCC,
- federal, state, or local law-enforcement agencies,
- the industry traceback consortium,
- its upstream provider.

Upon receipt of a traceback request, VIP Datacom LLC will:

- respond within 24 hours, but much faster if possible,
- cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls,
- identify the associated customer account,
- preserve relevant records,
- provide subscriber and usage information within its possession or control,
- coordinate with its upstream provider for network-level information.

9. STIR/SHAKEN Status

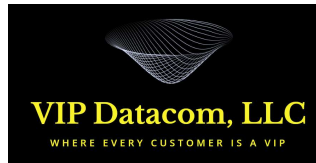
VIP Datacom LLC does not operate signing or verification infrastructure.

STIR/SHAKEN authentication and verification functions are performed by the upstream provider where technically feasible. VIP Datacom LLC relies on its upstream provider's implementation and certifies its compliance through this robocall mitigation plan as a non-facilities-based reseller.

10. Enforcement and Account Termination

VIP Datacom LLC may impose one or more of the following actions for violations:

- immediate suspension of service,
- permanent termination of service,
- refusal of future service,
- reporting to the upstream provider and appropriate authorities.



11. Internal Accountability and Training

VIP Datacom LLC designates a compliance contact responsible for:

- maintaining this Plan,
- coordinating with the upstream provider,
- responding to traceback and regulatory inquiries.

Relevant staff receive training on:

- customer vetting procedures,
- complaint handling and escalation,
- robocall risk indicators.

12. Recordkeeping

VIP Datacom LLC maintains records of:

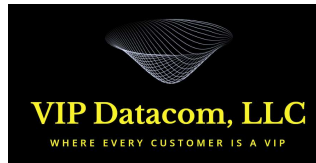
- customer onboarding documentation,
- compliance reviews and investigations,
- complaints and escalation actions,
- suspensions and terminations.

Records are retained for a minimum of two (2) years or longer where required by law or contract.

13. Review and Updates

This Plan is reviewed periodically and updated as needed to reflect:

- changes in FCC rules,
- changes in upstream provider capabilities,
- operational changes at VIP Datacom LLC.



14. Certification 47 CFR 64.6305(d)

VIP Datacom LLC certifies that it has not implemented the STIR/SHAKEN authentication framework on any portion of its network because it does not have a network and relies exclusively on its upstream provider(s) network. Any underlying provider used by VIP Datacom LLC will be fully STIR/SHAKEN compliant. **47 CFR 64.6305 (d) (1) (iii) and 47 CFR 64.6305 (d) (2) (i)**

VIP datacom LLC certifies that it has not had any prior certification removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission. **47 CFR 64.6305 (d) (1)**

VIP Datacom is unable to implement STIR/SHAKEN due to a lack of control over the network infrastructure necessary to implement STIR/SHAKEN. **47 CFR 64.6305 (d) (2) (i)**

VIP Datacom will respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. **47 CFR 64.6305 (d) (2) (iii)**

Neither VIP Datacom LLC nor any entity for which the filing entity shares common ownership, management, directors, or control has been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description. **47 CFR 64.6305 (d) (2) (iii)**

This Robocall Mitigation Plan is implemented in good faith and that the practices described herein are followed in its operations as a non-facilities-based VoIP reseller.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 11, 2026.

Signature **47 CFR 64.6305 (d) (3) (ii)**