

Robocall Mitigation Program Description

Company Name: Vitalisys Multiservicios LLC

Date: February 13, 2026

1. Company Overview

Vitalisys Multiservicios LLC is a non-facilities-based Voice over IP (VoIP) service provider that offers SIP trunking, IP telephony solutions, and PBX integrations to business end users. The company deploys and manages IP PBX platforms such as FreePBX and VitalPBX for its customers and resells voice services obtained from upstream voice service providers.

Vitalisys Multiservicios LLC does not own or operate telecommunications network facilities, does not control numbering resources, and does not directly originate calls to the public switched telephone network (PSTN). All outbound PSTN call origination is performed by upstream voice service providers.

2. STIR/SHAKEN Exemption

Pursuant to 47 CFR § 64.6304(d), Vitalisys Multiservicios LLC is exempt from implementing the STIR/SHAKEN authentication framework. The company does not function as a facilities-based originating voice service provider and does not possess the technical capability to authenticate or sign calls using STIR/SHAKEN certificates.

Vitalisys Multiservicios LLC relies on third-party upstream voice service providers to originate calls to the PSTN and, where applicable, to implement STIR/SHAKEN authentication. As a reseller and integrator, the company does not directly control call signing or call authentication processes.

3. Robocall Mitigation Program

Although exempt from direct STIR/SHAKEN implementation, Vitalisys Multiservicios LLC has established and maintains a robocall mitigation program consistent with 47 CFR § 64.6305(a) to prevent the origination of illegal robocalls on its network.

3.1 Customer Vetting and Onboarding

Vitalisys Multiservicios LLC performs reasonable due diligence on customers prior to service activation, which may include:

- Verification of customer identity and business legitimacy
- Review of the intended use of voice services
- Prohibition of anonymous or high-risk use cases
- Acceptance of service terms that explicitly prohibit illegal robocalling, spoofing, or fraudulent activity

3.2 Traffic Monitoring and Abuse Detection

The company monitors customer traffic patterns for indicators of potential abuse, including but not limited to:

- Abnormally high call volumes
- Short-duration or repetitive call patterns
- Traffic inconsistent with the customer's stated business purpose

Automated alerts and manual reviews are used to identify suspicious behavior.

3.3 Enforcement and Corrective Actions

If potentially illegal or abusive activity is detected, Vitalisys Multiservicios LLC may take immediate corrective action, including:

- Traffic throttling or temporary suspension
- Customer notification and investigation
- Permanent service termination for confirmed violations

Upstream providers are notified as appropriate.

4. Upstream Provider Oversight

Vitalisys Multiservicios LLC utilizes reputable upstream voice service providers that maintain their own robocall mitigation programs and STIR/SHAKEN compliance where applicable. The company cooperates with upstream providers to address abuse, investigate suspicious traffic, and prevent illegal robocalls from traversing the network.

5. Traceback Cooperation

Vitalisys Multiservicios LLC commits to fully cooperate with traceback requests from the Federal Communications Commission, law enforcement agencies, and the industry traceback consortium.

The company will respond to all traceback requests within **24 hours**, provide all reasonably available call data, and take prompt corrective action when illegal robocalling activity is identified.

6. Ongoing Compliance

Vitalisys Multiservicios LLC regularly reviews and updates its robocall mitigation practices to ensure continued compliance with applicable federal regulations. The company acknowledges its responsibility to prevent the use of its services for illegal robocalling and is committed to maintaining effective safeguards against such activity.