

Vast Communications LLC – Robocall Mitigation Program Description

Vast Communications LLC (“Vast”) provides audio conferencing services. Vast originates a limited subset of outbound calls through its conferencing platform’s dial-out (“Call Me”) functionality. Vast has not yet completed STIR/SHAKEN implementation across all originating call paths and is evaluating deployment within its SBC and interconnection environment. Pursuant to 47 CFR § 64.6305(a), Vast maintains a robocall mitigation program for all calls it originates.

Vast employs the following controls designed to prevent the origination of illegal robocall traffic:

- 1 Customer identity and payment verification at account creation.
- 2 Mandatory acceptance of Terms of Service and Privacy Policy prohibiting unlawful telemarketing, fraudulent activity, and abusive calling patterns.
- 3 Dial-out capability is disabled by default and enabled only upon customer request following internal review.
- 4 Dial-out functionality is restricted to authenticated hosts and requires manual number entry for each outbound call.
- 5 Ongoing monitoring for abnormal or unreasonable calling patterns, with enforcement actions up to and including suspension or termination of service.

Vast commits to respond fully and within 24 hours to traceback requests from the Federal Communications Commission, law enforcement, and the Industry Traceback Group, and to cooperate in investigating and stopping any illegal robocall activity.