



Invizio Robocall Mitigation Plan (RMD)

Company Name: Invizio, LLC

Effective Date: 03/01/2026

Service Type: Interconnected VoIP (Non-Facilities-Based Reseller)

Upstream Providers: CoreDial, SkySwitch

1. Overview

Invizio, LLC ("Invizio") provides interconnected Voice over Internet Protocol (VoIP) services to business and non-profit customers in the United States through resale of services delivered by upstream providers, including CoreDial and SkySwitch.

Invizio does not operate its own telecommunications network infrastructure and does not directly interconnect with the public switched telephone network (PSTN). All voice traffic is routed through and enabled by its upstream providers.

2. STIR/SHAKEN Implementation

Invizio relies on its upstream providers, including CoreDial and SkySwitch, to implement STIR/SHAKEN caller ID authentication in accordance with applicable regulations of the Federal Communications Commission (FCC).

These upstream providers are responsible for:

- Signing outbound calls using STIR/SHAKEN protocols
- Verifying inbound calls
- Maintaining appropriate certification and participation in industry authentication frameworks

Invizio does not directly implement STIR/SHAKEN but ensures that all outbound voice traffic is originated exclusively through STIR/SHAKEN-compliant upstream providers.

3. Robocall Mitigation Practices



Invizio provides voice services exclusively to commercial and non-profit organizations for typical business communications use cases. Invizio does not knowingly offer services to call centers, telemarketing firms, or high-volume outbound dialing operations.

Customer usage patterns are expected to align with standard business calling behavior. Any deviations from expected usage profiles, including unusually high outbound call volumes or patterns indicative of automated dialing, are subject to review and may result in service restrictions or termination.

To prevent the origination of illegal robocalls and spoofed traffic, Invizio implements the following mitigation measures:

3.1 Customer Vetting

- Invizio provides services primarily to established business and non-profit customers
 - Customer onboarding includes identity verification and business use validation
 - High-risk customer profiles are subject to additional scrutiny
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3.2 Acceptable Use Policy

Invizio maintains and enforces an Acceptable Use Policy that prohibits:

- Caller ID spoofing or misrepresentation
- Transmission of illegal robocalls
- Use of services for fraudulent or deceptive practices

Violations may result in immediate suspension or termination of service.

3.3 Traffic Monitoring

Invizio monitors customer usage patterns for indicators of suspicious activity, including:

- Unusual spikes in outbound call volume
- High call completion failure rates
- Short-duration, high-frequency call patterns

Accounts exhibiting suspicious behavior are reviewed and may be restricted pending investigation.

3.4 Upstream Coordination

Invizio coordinates with its upstream providers (CoreDial, SkySwitch) to:



- Respond to traceback requests
 - Investigate suspicious traffic
 - Enforce call blocking or service restrictions when necessary
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3.5 Traceback Cooperation

Invizio will respond promptly to lawful traceback requests from:

- Industry Traceback Group
- Law enforcement agencies
- Regulatory authorities

Invizio will provide relevant customer and call detail information to the extent required and permitted by law.

4. Know Your Customer (KYC) Practices

Invizio maintains internal procedures to reasonably verify the identity and legitimacy of its customers, including:

- Collection of business entity information
- Verification of contact details
- Review of intended service use cases

Enhanced due diligence is applied for customers requesting:

- High outbound call volumes
 - Large DID blocks
 - Non-standard or atypical usage patterns
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5. Call Blocking and Enforcement

Invizio reserves the right to:

- Block outbound calls suspected of being illegal or fraudulent
- Suspend or terminate services for policy violations
- Refuse service to customers engaged in prohibited activities

Invizio relies on both internal controls and upstream provider capabilities to enforce these measures.

6. Recordkeeping

Invizio maintains records sufficient to support:

- Customer identity and account details
- Service configurations
- Call activity logs (as available through upstream providers)

Records are retained in accordance with applicable legal and business requirements.

7. Ongoing Compliance

Invizio periodically reviews and updates this Robocall Mitigation Plan to ensure continued compliance with applicable regulations and industry best practices.

8. Contact Information

For inquiries related to this Robocall Mitigation Plan:

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