

Robocall Mitigation Plan: VegaNext, LLC (dba VegaTel)

Date of Filing: March 26, 2026 **Filer:** VegaNext, LLC **FCC Registration Number (FRN):**
[Your 10-digit FRN]

1. Introduction & Purpose

VegaNext, LLC ("The Company") provides managed IT and VoIP services under the brand VegaTel. This Robocall Mitigation Plan (RMP) outlines the "reasonable steps" the Company takes to avoid originating, carrying, or processing illegal robocall traffic, as required by **47 CFR § 64.6305**.

2. STIR/SHAKEN Implementation Status

The Company has certified in the Robocall Mitigation Database as having **[Partial Implementation / No Implementation]**.

- **Reason for Extension:** The Company qualifies as a small voice service provider under **47 CFR § 64.6304**. We rely on upstream intermediate and terminating providers to authenticate and sign calls via the STIR/SHAKEN framework while we continue to upgrade internal systems.

3. Know Your Customer (KYC) Procedures

VegaNext employs a multi-layered KYC process to ensure that all customers are legitimate business entities.

- **Identity Verification:** Before service activation, we collect the customer's legal name, physical business address, Federal Tax ID (EIN), and a primary point of contact.
- **Service Agreement:** All customers must sign a Master Service Agreement (MSA) that strictly prohibits the use of VegaTel services for illegal robocalling, spoofing, or telemarketing violations.
- **Usage Review:** We evaluate the "nature of business" for new clients. High-volume dialers or telemarketing firms are subject to enhanced due diligence and may be denied service if they cannot prove compliance with TCPA regulations.

4. Know Your Upstream Provider (KYUP) — *Required for Gateway Status*

As a gateway provider for select traffic, VegaNext takes the following steps to vet foreign upstream partners:

- **Database Verification:** We verify that all upstream foreign providers are registered in the FCC Robocall Mitigation Database.
- **Contractual Obligations:** We require upstream partners to certify that they have their own robocall mitigation programs in place and that they are not knowingly transmitting illegal traffic.

5. Call Analytics & Monitoring

The Company monitors its network for traffic patterns indicative of illegal robocalling, including:

- **High Volume/Short Duration:** Unusual spikes in calls lasting less than 6 seconds.
- **Low Completion Rates:** Monitoring for high rates of "Unanswered" or "Busy" signals which suggest sequential dialing.
- **Traceback Response:** The Company commits to responding to all **Industry Traceback Group (ITG)** and Law Enforcement requests **within 24 hours**. We maintain a 24/7 technical contact for these requests.

6. Enforcement & Termination

If a customer is found to be originating illegal robocalls:

1. **Immediate Suspension:** Traffic from the suspected source is throttled or suspended.
2. **Investigation:** The customer must provide proof of "prior express written consent" for the calls in question.
3. **Termination:** Any customer found in material breach of our anti-robocall policy will have their service terminated permanently.

Official Certification

I, **Pervez Delawalla**, CEO of VegaNext, LLC, certify that the information contained in this Robocall Mitigation Plan is true and accurate to the best of my knowledge.

Signature:  Title: President & CEO, VegaNext, LLC

