

ROBOCALL MITIGATION PROGRAM

VECTOR SECURITY, INC., D/B/A VECTOR SECURITY NETWORKS

Effective Date: March 30, 2026

Last Updated: March 30, 2026

1. PURPOSE AND SCOPE

- 1.1. This Robocall Mitigation Program ("**Program**") is adopted by Vector Security, Inc. ("**Company**"), a non-facilities-based reseller of Voice over Internet Protocol ("VoIP") services to commercial end user customers, to comply with 47 CFR § 64.6305. The Program is adopted in recognition of the Company's exemption from STIR/SHAKEN implementation under 47 CFR § 64.6304 on the basis that the Company lacks control over the network infrastructure necessary to implement STIR/SHAKEN.
- 1.2. The Company is a non-facilities-based provider that resells VoIP services to commercial end user customers through its upstream carrier(s). This Program covers all voice services resold by the Company through its upstream carrier(s) that are interconnected with the public switched telephone network ("**PSTN**") and utilize North American Numbering Plan ("**NANP**") resources, including VoIP services provided in connection with the Company's commercial managed network services and related communications services.
2. **The Company is a non-facilities-based voice service provider that does not own, operate, or control the network infrastructure necessary to implement STIR/SHAKEN . The Company relies on its upstream carrier(s) to authenticate calls and is exempt from direct STIR/SHAKEN implementation under 47 CFR § 64.6304.**

3. REASONABLE STEPS TO AVOID ORIGINATING ILLEGAL ROBOCALL TRAFFIC

- 3.1. Know-Your-Customer: The Company collects identifying information from end users sufficient to verify customer identity and service use consistent with the Company's managed network services.
- 3.2. Acceptable Use Policy: Commercially reasonable efforts are made for end users to acknowledge that they will not use the Company's voice services for:
 - (a) illegal robocalls in violation of the Telephone Consumer Protection Act ("**TCPA**"), Telemarketing Sales Rule ("**TSR**"), or applicable state laws;
 - (b) caller ID spoofing in violation of the Truth in Caller ID Act.
- 3.3. Account Suspension and Upstream Notification: The Company will suspend or terminate service to any end user identified as the source of illegal robocall traffic or in violation of the Acceptable Use Policy.

4. KNOW-YOUR-UPSTREAM-CARRIER

- 4.1. As a reseller, the Company maintains a limited set of approved upstream carrier agreements through which all resold VoIP services are provisioned. The Company verifies that all upstream carrier(s) maintain active, non-delisted filings in the FCC's Robocall Mitigation Database.
- 4.2. The Company's written agreements with upstream carriers require the carrier to:
 - (a) cooperate with traceback requests within twenty-four (24) hours.

- 4.3. The Company verifies that its upstream carrier (s) maintain active filings in the FCC Robocall Mitigation Database.

5. TRACEBACK COOPERATION

- 5.1. The Company commits to respond within twenty-four (24) hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium (currently Somos, Inc.).
- 5.2. Designated Traceback Contact:
- (a) Name: Bill Phillips
 - (b) Title: Sr Director, Network Operations
 - (c) Email: wdphillips@vectorsecurity.com
 - (d) Telephone: 330-717-7751
- 5.3. Upon receipt of a traceback request, the Company will:
- (a) promptly engage its upstream carrier(s) to trace call traffic through the network;
 - (b) provide all available customer account records, call detail records received from upstream carriers, and onboarding documentation within twenty-four (24) hours;
 - (c) preserve all relevant records as required by applicable law; and
 - (d) suspend or terminate the customer account identified as the source of illegal traffic.

6. DESIGNATED CONTACT FOR ROBOCALL MITIGATION

- 6.1. The Company has designated the following individual as the responsible employee for robocall mitigation-related issues:
- (a) Name: Ken Moore
 - (b) Title: Manager, Service Delivery
 - (c) Email: kemoore@vectorsecurity.com
 - (d) Telephone: 703-621-6116
 - (e) Business Address: 2000 Ericsson Dr, Warrendale, PA 15086
- 6.2. This designated contact is responsible for:
- (a) RMD filing and annual recertification;
 - (b) liaison with the FCC, law enforcement, and the industry traceback consortium.

7. RECORDKEEPING

- 7.1. The Company maintains records sufficient to demonstrate compliance with this Program, including customer onboarding documentation, upstream carrier agreements, and traceback response records.