

Voix Networks Limited Robocall Mitigation Plan

Effective Date: 20th April 2026

Version: 1.0

1. Introduction

Voix Networks Limited is a licensed Private Network Link (PNL) provider in Nigeria, operating under the regulatory framework of the Nigerian Communications Commission (NCC). We are committed to preventing the origination and transmission of illegal robocalls on our network. This plan describes our proactive steps to mitigate fraudulent traffic destined for the United States.

2. Know Your Customer (KYC) Procedures

We employ rigorous "Know Your Customer" vetting to ensure that only legitimate users have access to our network. These steps include:

- **Identity Verification:** Collecting and verifying national identification, business registration documents (CAC), and physical address details.
- **Usage Monitoring:** Evaluating the intended use of our voice services to ensure they align with legal business activities.
- **Contractual Prohibitions:** Including specific clauses in our Terms of Service that strictly prohibit the use of our network for illegal robocalling, spoofing, or telemarketing without prior consent.

3. Call Analytics and Monitoring

We use automated tools and manual reviews to identify suspicious traffic patterns in real-time, such as:

- **High Volume/Short Duration:** Monitoring for large bursts of calls with very short durations (under 6 seconds) or low completion rates.
- **Sequential Dialing:** Identifying and blocking patterns indicative of automated wardialing.
- **Caller ID Validation:** Ensuring subscribers only use the Nigerian numbering resources (+234209220xxxx) assigned to us by the NCC.

4. Traceback Cooperation and Response Procedures

Voix Networks Limited acknowledges its affirmative obligation to fully cooperate with the FCC, U.S. law enforcement, and the Industry Traceback Group (ITG) regarding any traffic originating from or passing through our network.

- **24-Hour Response Commitment:** We have established internal protocols to ensure that all traceback requests are acknowledged and investigated within **24 hours** of receipt.
- **Source Identification:** Our network engineering team maintains detailed call detail records (CDRs) that allow us to identify the specific upstream source or end-user subscriber for any call in question, regardless of whether it originated on our network or was received from a peer.

- **Designated Point of Contact:** We maintain a dedicated, monitored email alias and a 24/7 technical operations center to receive and process these requests without delay.
- **Upstream Enforcement:** If a traceback inquiry reveals that illegal traffic was delivered to us by another carrier, we will immediately notify that carrier and require proof of mitigation or terminate the interconnection if the behavior persists.

Primary Traceback Contact:

- **Name/Title:** Emeka Onyeama
- **Email:** emekaonyeama.voix-networks.net
- **Telephone:** +234 807 709 2500

5. Enforcement and Mitigation Actions

If a customer is found to be originating illegal robocall traffic, we will take immediate action, which may include:

- Temporary suspension of service for investigation.
- Permanent termination of the service contract for confirmed violations.
- Reporting the entity to the Nigerian Communications Commission (NCC) and relevant international authorities.

6. Legal and Regulatory Compliance

This plan is designed to comply with FCC requirements while adhering to the data privacy and telecommunications laws of Nigeria. We certify that all voice traffic originated by our network is subject to this robocall mitigation program.