

ROBOCALL MITIGATION PROGRAM

Pursuant to 47 CFR § 64.6305(a)

COMPANY NAME	VoIPOne LLC
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EXECUTIVE SUMMARY

VoIPOne LLC has submitted its certifications and robocall mitigation plan to the Robocall Mitigation Database (RMD), including the expanded disclosure requirements. As an interconnected Voice over Internet Protocol (VoIP) service provider, VoIPOne LLC maintains full compliance through its initial and ongoing certifications.

VoIPOne LLC is committed to preventing illegal calls from originating on its network and to monitoring inbound traffic. This plan describes the company's multi-layered robocall prevention approach, including risk-based controls and full cooperation with traceback activities.

COMPANY PURPOSE AND ROLE

VoIPOne LLC operates as an interconnected VoIP service provider and delivers telecommunications infrastructure to end-users. The company is committed to stopping illegal calls at their source while keeping legitimate communications uninterrupted. Robust upstream and downstream vetting is used to preserve network integrity.

GOVERNANCE AND COMPLIANCE STRUCTURE

- **Zero-Tolerance Policy:** VoIPOne LLC applies a strict policy against illegal robocalling, spoofing, and abusive practices.
- **Compliance Officer Responsibilities:** A designated officer manages RMD filings, customer onboarding, traceback coordination, and quarterly reviews. Policies are documented, audited annually, and revised as regulatory requirements change.

CUSTOMER VETTING (KNOW YOUR CUSTOMER)

- **Verification Process:** Every new customer undergoes identity confirmation, including name verification, email address validation, and location verification. Submitted information is cross-checked against databases and third-party sources.
- **Risk Classification:** Customers are classified as Low, Medium, or High Risk according to traffic profiles, reseller status, and exposure. High-risk entities are subject to enhanced due diligence and management approval.
- **Ongoing Monitoring:** Renewing customers are re-verified annually to confirm continued compliance.

CUSTOMER AGREEMENTS AND TERMS OF SERVICE

Before activation, every customer must accept VoIPOne LLC's Terms of Service (TOS). The principal prohibitions are:

- Providing altered, deceptive, or false information concerning sender identity or the origin of a call.
- Conducting "autodialing" and/or "telemarketing" without consent.
- Any violation results in immediate suspension or termination, together with mandatory reporting of suspected issues.

NETWORK MONITORING AND TRAFFIC CONTROLS

VoIPOne LLC systems are configured for active oversight:

- **Blocking Mechanisms:** Invalid ANI is blocked, while spoofed or unallocated caller IDs are rejected in real time.
- **Daily Analytics:** Potential spam indicators are reviewed daily, and flagged ANIs are blocked promptly.
- **Pattern Detection:** Real-time analysis identifies anomalies such as sudden traffic spikes, short-duration calls, or sequential dialing. Suspicious patterns cause automated suspension pending review.
- **DNC Enforcement:** Network-wide integration prevents calls to numbers registered on Do Not Call lists.
- **Mass Calling Monitoring:** Mass calling events are monitored continuously, with coordination among the Industry Traceback Group (ITG), trusted third parties, and federal agencies to mitigate fraudulent calls.
- **Do Not Originate (DNO) Blocking:** In coordination with the ITG, VoIPOne LLC blocks government impersonation calls, "call back" Direct Inward Dial (DID) numbers used in scams, including one-ring scams, and numbers associated with mass robocalling campaigns identified by trusted third parties.
- **Cease-and-Desist Response:** VoIPOne LLC is prepared to apply additional network-level blocking in response to FCC "cease-and-desist" letters when recipients do not take remedial measures.

TRACEBACK AND ENFORCEMENT COOPERATION

- **Response Protocol:** All traceback requests from the FCC, U.S. Telecom, law enforcement, or other authorized entities are resolved within 24 hours.
- **Investigation Process:** Suspected accounts are suspended during review, confirmed violators are terminated permanently, and data and technical assistance are provided.
- **User Feedback:** Reporting mechanisms encourage users to report suspicious calls, followed by prompt investigation and action.

CONTINUOUS IMPROVEMENT AND TRAINING

- Staff receive regular training on FCC regulations and robocall prevention techniques.
- Customers are educated about their compliance obligations to encourage responsible use.
- Audits verify program effectiveness, and updates are made within 10 business days of material changes.
- **Program Updates and Collaboration:** The robocall mitigation program is updated regularly in line with industry best practices. VoIPOne LLC collaborates with industry stakeholders to combat illegal robocalling, help eradicate illegal robocall traffic, and protect consumers from unwanted and fraudulent calls.

CERTIFICATION

I certify under penalty of perjury under the laws of the United States of America that the foregoing statements concerning VoIPOne LLC's Robocall Mitigation Program are true and correct.	
Muhammad Ashraf Rao	Manager, VoIPOne LLC

This document is submitted as an attachment to the VoIPOne LLC filing in the FCC Robocall Mitigation Database.