

ROBocALL MITIGATION PLAN

Company Name: Vanguard Logistics
FCC Registration Number (FRN): 0038686697

1. Robocall Mitigation Program Description

Vanguard Logistics maintains a comprehensive Robocall Mitigation Program designed to prevent its network and services from being used to originate, transmit, or facilitate unlawful robocalls, spoofing, or other fraudulent calling activity.

The Company's mitigation practices include:

- Conducting Know-Your-Customer (KYC) and customer due diligence procedures prior to service activation.
- Reviewing customer business activities, intended use cases, expected traffic volumes, and traffic profiles.
- Monitoring call volumes, traffic patterns, destinations, caller identification information, and other relevant indicators for potentially anomalous activity.
- Investigating and taking appropriate action against suspected illegal, fraudulent, or abusive traffic.
- Maintaining ongoing network monitoring and alerting mechanisms to identify unusual or potentially suspicious traffic patterns.
- Suspending, blocking, restricting, or terminating services when confirmed violations or significant risks of misuse are identified.

2. Know-Your-Customer (KYC) Measures

Prior to activating services, Vanguard Logistics conducts reasonable customer due diligence procedures, which may include verification of:

- Legal business name and business address.
- Government-issued identification and/or appropriate business documentation, as applicable.
- Intended use of the services and expected calling volumes.
- Nature and type of calling activity.
- Relevant upstream and downstream carrier or interconnection relationships.
- Customer agreement to comply with applicable laws, regulations, and the Company's acceptable-use requirements.

Customers may be subject to additional review or enhanced monitoring where suspicious or potentially non-compliant activity is identified. Vanguard Logistics may suspend or terminate services where violations are confirmed or where continued service presents a significant compliance risk.

3. Traffic Monitoring and Call Analytics

Vanguard Logistics maintains ongoing monitoring of network traffic to identify potentially fraudulent, abusive, or anomalous calling patterns.

Monitoring may include analysis of:

- Unusual short-duration or high-volume calling patterns.
- Significant or unexpected traffic spikes.
- Abnormal ASR, ACD, or other traffic-profile changes.
- Suspicious, inconsistent, or potentially manipulated caller ID information.
- Repeated calling patterns or unusual destination activity.
- Traffic inconsistent with the customer's approved business use case.
- Other indicators associated with potentially unlawful or abusive calling activity.

Traffic identified for review is evaluated by appropriate operations and compliance personnel. Where suspicious or unlawful activity is confirmed, Vanguard Logistics will take appropriate mitigation measures, which may include blocking or restricting traffic, customer suspension, termination of service, and escalation to relevant parties.

4. Traceback and Regulatory Cooperation

Vanguard Logistics is committed to cooperating with the Federal Communications Commission (FCC), law enforcement agencies, and recognized industry traceback organizations in investigations involving suspected illegal robocall or spoofing activity.

Vanguard Logistics will maintain processes to respond fully and within **24 hours** to valid traceback requests and will cooperate with authorized entities in investigating and mitigating unlawful traffic.

Where a traceback investigation identifies confirmed abusive or unlawful activity associated with a customer or upstream provider, Vanguard Logistics may take appropriate corrective action, including traffic blocking, service suspension, termination, and/or escalation to the appropriate parties.

5. STIR/SHAKEN Implementation

Vanguard Logistics is pursuing the implementation of STIR/SHAKEN capabilities applicable to its network and regulatory obligations.

The Company is pursuing the necessary Service Provider Code (SPC) token and related credentials required to support compliant caller-ID authentication. Vanguard Logistics will continue to monitor applicable FCC requirements and will update its STIR/SHAKEN implementation status and Robocall Mitigation Database filing as required.

The Company will maintain and update its robocall mitigation practices as necessary to remain aligned with applicable FCC requirements.

6. Point of Contact for Robocall Mitigation

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