



Robocall Mitigation Plan

Contents

Company	3
Thorough Vetting Process	4
Tools and Consistent Monitoring	4
Know Your Upstream Providers	5
Modus operandi in case of illegal traffic	6
Commitment	6

Company

Business Information

- **Legal name:** Vail Fiber LLC
- **Business name (DBA):** Vail Fiber
- **Address:** 7742 Spalding Dr. Suite 202, Norcross, GA, 30092

Contact Information for Robocall Mitigation-related Issues

- **Full Name:** Scott Posvar
- **Title:** Vice President
- **Department:** Telecom
- **Business Address:** 7742 Spalding Dr. Suite 202, Norcross, GA, 30092
- **Telephone Number:** 678-527-3880
- **Email Address:** support@vailfiber.com or law.enforcement@vailfiber.com for any law enforcement requests.

About

Vail Fiber LLC is a small reseller of network circuits and VoIP services founded in 2024. Its customer base is made of small-to-medium business customers and governments. We install and support business telephone system. Vail Fiber is consistently working to improve its network and security standards. It strives to halt illegitimate calls across its network.

Vail Fiber LLC is owned by:

It's Partners

Please note that Vail Fiber LLC has **not** been prohibited from filing in the Robocall Mitigation Database due to an enforcement action as well as Vail Fiber is **not** subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

Thorough Vetting Process

Prior to being an active Vail Fiber LLC customer, there is a thorough vetting process. Vail Fiber LLC is committed to keeping on enhancing this vetting process.

- Vail Fiber is a network and telephone service company. We sell, install and maintained business telephone system and computer networks for businesses. Customers cannot sign up for services on their own. We know our customer and their place of business. Customers go through a Know Your Customer process which includes providing their company name, complete physical location (including, but not limited to, street address, state, and country), phone number, email address and contact person. All this data is kept for security and law enforcement cooperation purposes if deemed required in the future.
- When signing up, customers are also required to accept Vail Fiber LLC [Terms of Service](#) & [Privacy Policy](#). The terms include but are not limited to the following:
 - If the customer will be using Vail Fiber LLC for telemarketing purposes, she/he has to get the written approval from Vail Fiber LLC beforehand. Vail Fiber LLC staff analyzes each telemarketing customer case-by-case.
 - Customer agrees to set a valid CallerID/ANI Identification.
 - Vail Fiber LLC can suspend users without warning to its sole discretion if it doesn't respect its Terms of Service (including, but not limited to, immediate service termination if the user carry or process illegal traffic).

Tools and Consistent Monitoring

When customer has been internally vetted, she/he now has access to Vail Fiber LLC platform. Nonetheless, it remains under scrutiny by the various algorithms in place. Increased scrutiny is obviously more present for newer accounts. They also have access to **less resources** such as limited outbound calling paths.

Vail Fiber LLC has several algorithms that trigger real-time alerts and notifications. A 24/7 fraud team and on- duty network team always monitor the aforementioned.

Customers are required to pass a valid CallerID format when attempting to place an outgoing call. Everything has to be set in the Vail Fiber LLC platform beforehand. Effective March 31st 2024, Vail Fiber LLC started to slowly roll out a number verification third-party vendor. The process will consist of verifying the identity of the user for CallerID purposes. During the verification process, the customer will be prompted to enter its phone number then receive a code via phone call or SMS message to enter and confirm its identity. In other words, any customer who will make outbound calls with a CallerID that is not one of his phone numbers with Vail Fiber LLC, will first have to go through the verification process.

Throughout discussions with its upstream carriers, Vail Fiber LLC received confirmation that its carriers (listed below) were making use at the very minimum of the Industry Traceback Group Do Not Originate list and have either started to adopt or will soon adopt additional Do Not Originate lists from third-party vendors including, but not limited to, Somos and Neustar. They also confirmed that these Do No Originate lists were applied network wide and therefore Vail Fiber LLC could benefit from it as a direct reseller. Effective August 29th, 2024 Vail Fiber LLC launched its own internal Do Not Originate list. We took this initiative to add an extra layer of complexity to fraud and robocall mitigation. We will slowly build up this internal list.

Know Your Upstream Providers

Vail Fiber LLC makes use of a selected number of carriers to route calls in United States, including:

XXXX
XXXX
XXXX
XXXX

Vail Fiber LLC has received assurances from those providers that they will abide by the FCC's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic.

Modus operandi in case of illegal traffic

A real-time block system is in place as soon as abnormal activities are detected (including but not limited to abnormal spike of calls, abnormal trends, low call completion statistics, systematic calling, unusual amount of calls, etc.). Vail Fiber LLC system blocks suspicious traffic and automatically reaches out to customers to understand the highlighted behavior. A dedicated team is always on the trigger to follow up with the customer. Vail Fiber LLC has a zero-tolerance policy when it comes to potential fraud, scam and robocall activities. Vail Fiber LLC also reviews outbound call logs and analytics regularly to monitor for any possible abuse. Finally, Vail Fiber LLC also works with its upstream providers to identify behaviors which indicate illegal call activity.

Commitment

To the extent that Vail Fiber LLC were to receive information from law enforcement, traceback entities or other sources that a customer is engaged in illegal robocalling, our policy is to cooperate fully, including providing the identity of any suspected illegal robocaller, pursuant to legal service or process. Our internal policy is to reply to those requests within 24 hours.

Vail Fiber LLC also follows the Industry Traceback Group recommended best industry practices and cooperates in traceback and trace forward investigations.

As a matter of fact, Vail Fiber LLC offers a single point of contact for any law enforcement requests: law.enforcement@vailfiber.com. Law enforcement agencies can simply provide the following information and the request will be treated on a highly accelerated basis:

- Full name, Authorized Agency / Department,
- Phone Number,
- Nature of Request (Subscriber info, Call detail records, Billing info, etc.),
- Target Telephone Number(s),
- Request Start Date and End Date,
- Copy of the Subpoena, Court Order, Search Warrant, or Other Formal Legal Process, and
- Additional Notes (incl. specific circumstances and/or deadlines).

If there are multiple requests, we request to submit only one legal process per email to ensure proper treatment.

While Vail Fiber LLC already had everything in place to fight illegitimate traffic (including but not limited to robocalls), it also fully commits to ensure compliance with this program and to keep on enhancing it. Vail Fiber LLC also fully complies with STIR-SHAKEN. In the event of any material change to this plan, Vail Fiber LLC will republish it to employees, and consultants and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.
