

ROBOCALL MITIGATION PROGRAM DESCRIPTION

Legal Entity Name	VIVACOM INC (doing business as Viva Digitally)
FCC Registration Number (FRN)	0034835447
Business Address	2340 Monaco Drive, San Jose, California 95124
Website	https://vivadigitally.com
Filing Type	Voice Service Provider
Services	Cloud telephony, unified communications (UCaaS), SIP/SBC-based voice services, Microsoft Teams telephony, and contact center solutions for business customers
Robocall Mitigation Contact	Anil Jhon, Senior Noc Manager
Contact Telephone	408-836-0410
Contact Email	anil.john@vivadigitally.com

1. Purpose and Scope

VIVACOM INC ("Viva") is committed to preventing the origination of illegal robocalls and spoofed calls on its network. This document describes the specific, reasonably sufficient robocall mitigation practices Viva uses for the voice traffic it originates and carries, and is filed in the FCC Robocall Mitigation Database in accordance with the Commission's rules.

Viva provides voice services to business customers under written service agreements. Viva does not provide residential retail voice service and does not sell or permit bulk, unsolicited, or unlawful calling.

2. STIR/SHAKEN Implementation Status

Viva's status with respect to implementation of STIR/SHAKEN caller ID authentication on the IP portions of its network is as follows

Viva has not yet implemented STIR/SHAKEN. In its place, Viva applies the robocall mitigation practices described in Section 3 to all calls it originates and carries.

3. Robocall Mitigation Practices

3.1 Know Your Customer (KYC)

Before activating service, Viva vets each customer and continues to review them throughout the relationship. Viva's practices include:

- Collecting and verifying legal business name, business address, tax or business registration information, and authorized contacts for every customer.

- Verifying the customer's identity and the nature of its business, including its intended use of the service and expected call volumes and calling patterns.
- Requiring customers to sign a service agreement that prohibits illegal robocalls, caller ID spoofing with intent to defraud, and violations of the Telephone Consumer Protection Act (TCPA), the Truth in Caller ID Act, and related FCC rules.
- Declining or terminating service to any customer that cannot be verified, provides false information, or is identified as a source of illegal robocalls.

3.2 Caller ID and Number Authorization

Viva allows customers to use only telephone numbers that Viva has assigned to them or that the customer has demonstrated the right to use. Viva does not permit customers to place calls using numbers they are not authorized to use.

3.3 Traffic Monitoring and Analytics

Viva monitors call traffic on an ongoing basis for patterns associated with illegal robocalls, including abnormally high call volumes, very short call durations, low answer-seizure ratios, high rates of sequential or randomly generated dialing, and unusual caller ID patterns. Viva uses Portaone and Grafana tools to support this review. Suspicious activity is investigated promptly.

3.4 Enforcement

When Viva identifies or is notified of suspected illegal robocall traffic, it takes prompt action, which may include contacting the customer, limiting or blocking the traffic, suspending service, and terminating the customer. Viva retains records of these actions.

3.5 Traceback Cooperation

Viva commits to responding fully and within 24 hours to all traceback requests from the Federal Communications Commission, the Industry Traceback Group (ITG), and other law enforcement or regulatory authorities. Viva maintains call detail records and customer information necessary to identify the source of traffic and will cooperate with all such inquiries.

3.6 Upstream and Downstream Providers

Viva accepts traffic only from, and sends traffic only to, providers that are listed in the Robocall Mitigation Database, where required by 47 CFR § 64.6305. Viva takes steps to ensure its upstream providers maintain appropriate robocall mitigation practices and will cease accepting traffic from any provider that is removed from the Database or fails to cooperate with traceback requests.

3.7 Legal Compliance and Governance

- Viva complies with the TCPA, the Truth in Caller ID Act, and applicable FCC rules governing robocalls and caller ID.
- The Chief Executive Officer is responsible for oversight of this program, and relevant staff are trained to recognize and escalate suspected illegal robocall activity.
- Viva reviews this program periodically and updates its practices and the Robocall Mitigation Database filing as needed.

4. Robocall Mitigation Contact

Questions, traceback requests, and other communications concerning this program may be directed to:

Anil Jhon, Senior Noc Manager.

VIVACOM INC (Viva Digitally)

2340 Monaco Drive, San Jose, California 95124

Telephone: +1 302 520 2534

Email: anil.john@vivadigitally.com

Date: October 6, 2026