



Robocall Mitigation Program Description

Submitted to the Federal Communications Commission – Robocall Mitigation Database (47 CFR § 64.6305)

1. Filer Information

Legal name of the filer	Vensmart Security S.A.S.
Tax ID (NIT, Colombia)	901438686-1
Doing business as	Vensmart
FCC Registration Number (FRN)	0039021498
Business address	Carrera 83E # 42-71, Apto 401A, Torre A, Barrio El Caney, Cali, Valle del Cauca, Colombia
Robocall mitigation contact	Freddy Barraes, CEO, +57 311 6480037
Contact e-mail	fbarraes@vensmart.com
Provider role	Voice service provider
STIR/SHAKEN status	Partial STIR/SHAKEN implementation

2. Nature of Our Traffic

Vensmart provides voice services exclusively to legally constituted businesses. Our customers place calls on their own behalf, to their own customers, for legitimate business purposes (customer service, account management, appointment follow-up and similar communications).

- **Legitimate numbers.** Every DID used as caller ID is lawfully assigned to Vensmart or to the customer and is traceable to that customer.
- **Identified caller.** Calls are presented in the name of our customer, whose legal identity and United States business address are verified before service is activated.
- **No predictive dialing.** We do not use or offer predictive dialers. Calls are placed by live agents.
- **No unlawful traffic.** We do not originate, accept or transit fraudulent, spoofed, deceptive or illegal robocalls, and our service terms prohibit them.

3. Know Your Customer (KYC)

Before any customer is allowed to originate traffic, we:

- verify the customer's legal existence (business registration, tax ID) and its physical business address in the United States;
- identify an authorized representative and keep valid contact information on file;
- confirm the right of the customer to use each telephone number it presents as caller ID, and keep records of number assignment;
- review the customer's intended use of the service and reject applications that do not have a legitimate business purpose;
- require acceptance of service terms that prohibit illegal robocalls, caller-ID spoofing and violations of the TCPA, the Telemarketing Sales Rule and the National Do-Not-Call Registry rules, with immediate suspension as the consequence of a breach;
- re-validate customer information periodically and whenever usage changes significantly.

4. Caller ID Integrity

- Only numbers assigned to Vensmart or verified as belonging to the customer may be used as caller ID; calls with unauthorized, invalid or unallocated caller ID are not transmitted.
- Caller ID is presented consistently with the identity of the customer placing the call.
- STIR/SHAKEN attestation is applied according to our implementation status stated in Section 1, and attestation information received from upstream providers is preserved.

5. Traffic Monitoring and Analytics

We monitor customer traffic to detect patterns associated with illegal robocalling, including:

- unusually high call volumes or calls per second for the customer's profile;
- high proportion of very short-duration calls and low answer rates;
- sequential or random dialing patterns and calls to invalid or unassigned numbers;
- changes in caller-ID behavior and complaints received from called parties or other carriers.

Anomalies are reviewed promptly; traffic is throttled or suspended while the customer is investigated.

6. Response to Illegal Traffic

- Any customer found originating illegal robocalls is suspended immediately and, where confirmed, terminated.
- We act on notifications from the FCC, law enforcement, the Industry Traceback Group and other providers, and we block traffic identified as illegal.
- Records of the investigation and the actions taken are retained.

7. Traceback Cooperation

Vensmart commits to cooperate fully with the FCC, law enforcement and the Industry Traceback Group, and to respond to traceback requests within 24 hours, identifying the upstream provider or the originating customer of the call.

8. Upstream and Downstream Providers

- We accept traffic only from customers and providers that we have identified and, where applicable, that are listed in the Robocall Mitigation Database.
- We exchange traffic only with downstream providers that comply with the FCC robocall mitigation rules.

9. Program Review

This program is reviewed at least once a year and whenever FCC rules change. The filer will update its Robocall Mitigation Database certification within 10 business days of any change to the information it contains.

10. STIR/SHAKEN Exemption (if applicable)

Rule that exempts the filer from STIR/SHAKEN compliance and why it applies:

Vensmart does not sign calls with its own STIR/SHAKEN certificate. All traffic to the United States is routed through DIDWW, a voice service provider with STIR/SHAKEN implemented, using DIDWW routes and DIDWW telephone numbers as caller ID. DIDWW, as the provider that assigns the numbers and carries the calls onto the U.S. network, authenticates and signs that traffic. Vensmart does not send U.S. traffic through any other route and does not present numbers that DIDWW has not assigned.

11. Certification

I certify that the statements in this description are true and accurate, and that the filer has implemented and will maintain the robocall mitigation program described above.

Name and title: Freddy Barraes, CEO

Freddy Barraes
Firmado digitalmente por Freddy Barraes
Fecha: 2026.10.15 18:52:00 -05'00'

Date: October 15, 2026