FCC Robocall Mitigation Database

Effective date: 04.11.2026. **Responsible officer:** Artem Bitiukov

Company: VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA

Jurisdiction: Spain. **SIP infrastructure:** Czech Republic

1. Purpose and scope

This Plan describes the controls VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA will apply to prevent, detect, investigate, and mitigate illegal robocalls and unlawful caller ID spoofing in voice traffic it carries or exchanges with interconnected providers, including calls destined for the United States.

VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA operates in wholesale voice and related telecommunications services. VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA operates as a foreign non-gateway intermediate provider, carrying calls from upstream international providers to downstream international providers rather than directly handing calls to U.S. operators.

2. Governance and accountability

The designated compliance function is accountable for implementation, incident response, documentation, and communications with the FCC, the Industry Traceback Group (ITG), and upstream/downstream carriers.

VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA should maintain documented escalation contacts and review this Plan at least annually and after material changes to its network, regulatory obligations, or risk exposure.

3. Customer and counterparty due diligence

Before enabling voice traffic, VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA seeks to verify the legal identity, registration, business address, authorized representatives, and relevant business purpose of each direct customer and upstream traffic source.

Risk-based review will consider geographic traffic patterns, expected volumes, caller ID practices, historical abuse indicators, and any relevant complaints or enforcement actions. Higher-risk accounts will receive enhanced checks and may be rejected.

VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA seeks contractual terms prohibiting illegal robocalls, unauthorized caller ID spoofing, and transmission of traffic in violation of applicable law, and will permit investigation, traffic restrictions, and termination.

4. Caller ID and spoofing controls

VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA will require customers and upstream providers to use caller ID information they are authorized to present, and will investigate invalid, malformed, unallocated, or suspiciously manipulated calling numbers where technically feasible.

VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA will not knowingly facilitate illegal spoofing. Controls may include traffic screening, validation of customer number-use rights, pattern analysis, and restrictions on suspect traffic, subject to the actual deployed network capabilities.

5. Traffic monitoring and mitigation

VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA uses available call detail records and network indicators, where operationally available, to assess and network indicators for unusual traffic spikes, short-duration/high-volume calling patterns, repeated destination attempts, abnormal answer-seizure ratios, and other indicators consistent with illegal robocalling.

Suspected abusive traffic will be reviewed promptly. Proportionate measures may include enhanced monitoring, rate limits, blocking specific sources or routes, suspension of affected accounts, or termination when justified and technically supported.

The compliance team will document the reason for each material mitigation decision and verify whether the measures resolved the issue.

6. Traceback requests and regulatory cooperation

VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA will designate and maintain an actively monitored contact for traceback and regulatory inquiries. It will cooperate with lawful FCC requests and traceback requests from the recognized traceback consortium, including identifying its immediate upstream source and relevant downstream handoff where records permit.

Requests will be logged, assigned, investigated, and answered within applicable deadlines. VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA will preserve relevant call detail records and supporting evidence in accordance with law and its retention policy.

7. STIR/SHAKEN and authentication status

The company will accurately describe in its FCC RMD certification the extent to which STIR/SHAKEN is implemented on applicable portions of its network, any lawful exceptions or limitations, and any alternative mitigation obligations. No representation of full deployment is made in this draft.

STIR/SHAKEN is not currently implemented. No specific exemption or extension is asserted in this document.

8. Incident response and enforcement

Upon credible notice of illegal traffic, VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA will (1) acknowledge and triage the report, (2) identify affected accounts, routes, and call records, (3) contain traffic where warranted, (4) investigate and coordinate with counterparties, (5) document findings and corrective actions, and (6) assess whether further escalation or termination is necessary.

Repeated or serious violations may result in immediate suspension or permanent termination consistent with contracts and applicable law.

9. Records, training and continuous improvement

VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA aims to retain, subject to applicable law and a documented schedule, onboarding records, risk reviews, relevant CDRs, complaints, traceback communications, investigations, and mitigation actions. Access will be restricted to authorized personnel.

Relevant voice operations, routing, sales, and compliance staff will receive role-appropriate instructions on abuse indicators, escalation paths, and this Plan. Controls will be revised based on incidents, regulatory changes, and testing results.

10. Certification and maintenance

An authorized officer will verify the factual accuracy of the RMD submission and this Plan before certifying. VX TELECOM GLOBAL PARTNERSHIP SOCIEDAD LIMITADA will keep required contact, ownership, certification, and mitigation information current and submit updates when FCC rules require.

This document does not replace the FCC portal certification, the required disclosures, or independent review of FCC rules governing foreign providers, intermediate providers, STIR/SHAKEN, and U.S.-numbered traffic.