# VTTelecom LLC
# Robocall Mitigation Plan

VTTelecom LLC is committed to protecting consumers and the telecommunications ecosystem from the harms caused by illegal robocalls. The company has adopted a comprehensive, multi-layered approach designed to detect, prevent, and eliminate unlawful traffic on its network. This approach includes customer vetting, active monitoring, call blocking, cooperation with enforcement authorities, and the implementation of industry standards such as STIR/SHAKEN.

In accordance with the Federal Communications Commission's (FCC) rules, VTTelecom LLC certifies in the Robocall Mitigation Database (RMD) whether it has implemented the STIR/SHAKEN authentication framework, and ensures that all calls it originates, carries, or processes are subject to a mitigation program.

## 1. STIR/SHAKEN Implementation

1.1. VTTelecom LLC has implemented the STIR/SHAKEN caller ID authentication framework on its IP-based voice traffic, consistent with FCC requirements.

1.2. For any traffic where STIR/SHAKEN cannot be applied, the company ensures that such calls are subject to its robocall mitigation program.

## 2. Clear Contract Provisions

2.1. Contracts explicitly state what types of traffic are permitted and prohibited.

2.2. Violations result in enforcement actions, up to and including termination.

2.3. VTTelecom LLC reserves the right to share information about violators with enforcement agencies and industry partners.

## 3. Customer Vetting

3.1. Comprehensive vetting of new commercial customers, including:

3.1.1. Verification of business identity and legitimacy

3.1.2. Collection of business address, contact details, incorporation documents, and federal tax ID (if applicable)

3.1.3. Review of the nature of the business and intended traffic patterns

3.2. Accounts that cannot be validated or appear suspicious are denied service.

## 4. Monitoring & Rapid Response

4.1. Continuous monitoring systems detect abnormal or suspicious traffic.

## 4. Monitoring & Rapid Response (continued)

4.2. All traceback notices are taken seriously, and VTTelecom LLC commits to responding within 24 hours to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG).

4.3. Customers must provide specific and verifiable explanations and corrective actions when issues are identified.

4.4. Repeat offenders or customers demonstrating lax compliance are suspended or terminated.

## 5. Communication & Documentation

5.1. Policies regarding robocall prevention are communicated directly to customers.

5.2. Records of these communications are maintained to document compliance efforts and ensure awareness of obligations.

## 6. Robocall Mitigation Database (RMD) Compliance

6.1. VTTelecom LLC has certified in the FCC’s Robocall Mitigation Database its use of STIR/SHAKEN and mitigation practices.

6.3. Only verified and registered businesses are permitted to originate traffic.

## 7. Call Blocking Measures

7.1. Calls to specific numbers identified as high-risk or abusive are actively blocked.

7.2. This reduces the spread and impact of illegal robocalls on end users.

## 8. Cooperation with Investigative Bodies

8.1. VTTelecom LLC fully cooperates with law enforcement, the FCC, and the ITG.

8.2. A single point of contact is designated for handling traceback requests and coordinating investigations.

8.3. All traceback requests are responded to within 24 hours.