

Robocall Mitigation Plan for VoIPFlo LLC

Updated as of February 27, 2026

Introduction VoIPFlo LLC ("VoIPFlo"), a small provider headquartered in Miami, Florida, specializes in inbound telephone services, including DID origination and termination delivered to U.S.-based call center customers. VoIPFlo does not originate or terminate any outbound calls into the U.S. PSTN, does not provide wholesale/SIP trunking services, and does not act as an intermediate or gateway provider for outbound traffic. All traffic handled by VoIPFlo is inbound to its customers' call centers (e.g., for customer support, inbound campaigns, or service lines). VoIPFlo does not accept foreign-originated traffic for origination purposes and operates solely with domestic U.S. NANP resources in an inbound context.

As a small provider without its own Class 4 switch or outbound origination platform, VoIPFlo relies on trusted carrier partners for network infrastructure and STIR/SHAKEN verification on inbound calls.

This Robocall Mitigation Plan outlines VoIPFlo's measures to support a secure voice ecosystem in compliance with FCC regulations, including section 64.6305 and the updated requirements from the 2025 Robocall Mitigation Database Report and Order (effective February 5, 2026, with first annual recertification due March 1, 2026). Given VoIPFlo's inbound-only model, the inherent risk of originating illegal robocalls is negligible, as robocalls are fundamentally an outbound origination issue. Mitigation efforts focus on inbound call integrity, customer vetting, and full regulatory compliance.

1. Contact Information VoIPFlo LLC

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Phone: 305 898 7374

Principals, Affiliates, Subsidiaries, and Parent Companies:

- Mercurio Bosche (CEO)

VoIPFlo affirms that neither it nor any affiliated entity has been subject to FCC or law enforcement action related to illegal robocalling, spoofing, or RMD deficiencies in the past two years.

- #### **2. Implementation of STIR/SHAKEN Framework**
- VoIPFlo complies with FCC STIR/SHAKEN caller authentication requirements for inbound calls through its

carrier partnerships. As an inbound-only provider without outbound origination infrastructure:

- Inbound calls to VoIPFlo's customers are verified using STIR/SHAKEN attestation results provided by upstream carriers (e.g., "A" level where originating provider has verified caller identity).
 - VoIPFlo supports enhanced call trust by delivering verified inbound traffic to call centers and blocking or flagging unverified/spoofed calls where feasible.
 - VoIPFlo certifies no STIR/SHAKEN implementation (Option 3 in RMD VoIPFlo does not sign outbound calls (as none are originated) and does not maintain its own SPC token or certificate, as this is unnecessary for an inbound-only provider.
 - VoIPFlo confirms no previous certification has been removed by Commission action.
3. **Robocall Monitoring and Mitigation** VoIPFlo prevents misuse of its inbound services through appropriate controls for its low-risk model:

Traffic Monitoring

- Monitors inbound call patterns for anomalies (e.g., unusual volume spikes or patterns indicative of spoofing). Relies on carrier-provided real-time alerts for suspicious inbound traffic. Independent outbound analytics are unnecessary and irrelevant, as VoIPFlo does not originate calls.

Customer Vetting

- Verifies new call center customers' identity, business legitimacy, and intended inbound use (e.g., customer support/hotlines).
- Requires agreement to terms prohibiting use of services for illegal activities, including outbound robocalling via other networks.
- Requires customers to comply with TCPA and immediately reports/blocks any misuse.
- Takes steps to ensure services are not used to facilitate illegal robocalls, though inbound-only nature poses minimal origination risk.

Complaint Resolution

- Provides a process for reporting suspected issues (via support channels).

- Investigates promptly and takes corrective action, up to service termination if violations confirmed.

4. **Call Analytics and Carrier Procedures**

- **Call Analytics:** Utilizes carrier-provided inbound verification and analytics to detect spoofed or suspicious inbound calls. As an inbound-only provider without outbound switching, independent outbound analytics are unnecessary and disproportionate to risk.
- **Carrier Procedures:** Prior to contracting and annually thereafter, VoIPFlo verifies each carrier partner's active RMD filing, STIR/SHAKEN status, and mitigation plan via the RMD portal.

5. **Compliance with FCC Requirements** VoIPFlo fully complies with FCC robocall mitigation rules:

- Maintains an active filing in the FCC's Robocall Mitigation Database (RMD), including role (voice service provider focused on inbound services to end-users/call centers), STIR/SHAKEN status, and mitigation plan.
- **Annual Recertification:** Will recertify RMD filing annually by March 1 (first deadline March 1, 2026; window opens February 1, 2026). Recertification involves logging into the RMD portal with multi-factor authentication (required effective February 5, 2026), verifying accuracy of all information (mitigation practices, STIR/SHAKEN certification, contacts), updating if needed, and submitting via the "Recertify" button.
- **Prompt Updates:** Updates RMD and CORES registration within 10 business days of any material change (e.g., ownership, contacts), per 47 CFR § 64.6305.
- Responds fully to ITG traceback requests within 24 hours (though inbound-only limits relevance).
- Pays any required filing fees when effective
- Responds promptly to FCC deficiency notices, curing issues within specified timeframes to avoid RMD removal or downstream impacts. Noncompliance risks include base forfeitures (\$10,000 for false/inaccurate info; \$1,000 per day until cured for late updates). VoIPFlo does not possess an Operating Company Number (OCN), as it is a small inbound-focused provider without local exchange carrier status. Per FCC guidance, no OCN is required, and "No" is selected on the RMD form.

6. **Future Enhancements** VoIPFlo commits to ongoing improvement:

- Enhancing inbound verification/blocking via carrier partnerships.
- Educating call center customers on secure inbound practices.
- Adapting to emerging threats (e.g., AI-generated inbound scams) through FCC guidance and partner tools.

7. **Commitment to Correct Deficiencies** VoIPFlo will address any FCC-notified RMD deficiencies immediately, updating certifications/plans, explaining actions, and ensuring compliance to maintain filing status.

Conclusion VoIPFlo LLC provides reliable inbound telephone services to its call center customers while supporting the integrity of the U.S. voice ecosystem. Through carrier partnerships, customer vetting, and full adherence to updated FCC requirements (including 2026 annual recertification by March 1), VoIPFlo ensures compliance in a low-risk, inbound-only environment. As a small provider with no outbound origination, VoIPFlo's plan is proportionate, effective, and aligned with FCC expectations.

Authorized By: VoIPFlo LLC Compliance Team

Contact: Mercurio Bosche, CEO

Program Review Cycle: Annual or as required by FCC changes