

## **DIALOG TELECOMMUNICATIONS INC. ROBOCALL MITIGATION PROGRAM**

Below is the Robocall Mitigation Plan filing for Dialog Telecommunications Inc. (Dialog). Dialog is a direct service provider to end user customers. This plan will be submitted to the FCC's Robocall Mitigation Database and will be adapted to adjust to the latest laws, regulations, and industry best practices.

Dialog's prior RMD certification has not been removed, and Dialog has not been prohibited from filing in the RMD. Neither Dialog or any affiliated entity has been subject to a Commission or other law enforcement agency action or investigation in the prior two years due to suspected involvement with illegal robocalling or spoofing, or due to a deficiency in its RMD certification.

### **Dialog Measures to Prevent Illegal Robocalls**

#### **Customer Vetting**

Dialog is a regional provider with a traditional sales/marketing department. All sales involve in-person interaction between a sales agent and a primary contact person representing the end user customer. Dialog sells voice origination and termination along with other products and services. Due to the personal nature of Dialog's sales practices, the Company maintains a close relationship with customers and an intimate knowledge of their business operations which helps identify potential generators of Robocall traffic.

#### **Know Your Customer**

Prior to converting or offering any telephone numbers to an end user customer, Dialog engages in in-person interaction to establish a contract with the subscriber to convert or offer voice service and associated telephone numbers. End user telephone numbers are validated via customer demonstration, review of the line ownership database, review of CNAM database records, and existing customer telephone bills.

#### **Monitoring**

Dialog has monitoring and reporting systems in place to analyze high-volume voice network traffic to identify and screen patterns that are consistent with robocalls. Our monitoring systems provide alerts on calling patterns with unusual spikes, traffic patterns, or attempted use of non-validated Telephone Number (TN) to detect patterns consistent with illegal robocalls. Dialog has a service agreement with TransUnion to assist with monitoring of Dialog's traffic to identify potential illegal robocall activity. TransUnion will abide by the FCC's STIR/SHAKEN and robocall

mitigation rules in all respects when providing call attesting services to Dialog. Dialog also uses TransUnion as its provider of third-party analytics. If Dialog detects a pattern consistent with illegal robocalls or has reason to suspect illegal robocalling or spoofing is taking place over our network, we will seek to identify the party that is using our network to originate, route, or terminate these calls, and take appropriate action. Appropriate action may include:

- Validating that the originating party is authorized to use the TN.
- Suspending calling party's ability to originate, route, or terminate calls on Dialog's network.
- Not initiating service if a potential client provides anonymous information or has data mismatches.

### **Traceback Cooperation**

Dialog commits to responding fully within 24 hours to and supporting all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG). Dialog has an ongoing commitment to scan for and help alleviate illegal robocalling by pre-qualifying prospective customers, monitoring existing customers for traffic patterns indicative of prohibited robocalls, and working with other providers and regulatory agencies in combatting and stopping fraudulent voice activity.

### **TransUnion's Robocall Mitigation Solution Overview**

General information:

- Robocall scoring is based on the annual +100B carrier calls that TransUnion processes as part of the Caller Name service.
- STIR/SHAKEN Transaction Detail Records (TDRs) are now being added as an additional data source.
- Each call is assessed through the TransUnion model, leading to constantly refreshed view of call behavior and probability of a given number currently being used for robocalling.
- Active numbers are assessed by the model for behavioral attributes typically associated with robocalling including Neighbor spoofing events or sudden spikes in volume, such as driven by call spoofing.
- Do-Not-Originate (DNO) numbers are also deemed to be robocalls if they are the calling party number. This is sourced from industry (e.g., US Telecom) and directly from enterprises.
- The service covers both US domestic and international TNs.

Calls Originating from your network (i.e., Robocall Protection)

- Provides detailed reporting identifying suspected illegal robocalls and alerts if calls originate where the calling number is invalid, unallocated, on a Do-Not-Originate list.
- If the platform detects suspected robocalling patterns, Dialog will take appropriate action which may include suspending or terminating the subscriber.
- Supports a real time query to service to determine if a number originating on your network could be a robocall. Such calls can be blocked, or the terminating party can be notified via CNAM.
- For each new instance of robocalling using the Operating Service Provider (OSP) TNs, an alert is sent to the OSP in near real time. This alert will result in the OSP (manually) blocking the TN and all TSPs being alerted via CNAM, through an overlay such as “ROBOCALLER”. CNAM alerting helps address instances of spoofing of TNs that are not going through the OSP that owns the number.

#### Termination (i.e., Robocall Mitigation)

- Dialog efforts to suppress robocalls supports a real-time query to service to determine if a number terminating on your network could be a robocall. This protects subscribers from calls that come from networks that cannot authoritatively attest to the end user caller. (i.e., all Communications Service Providers (CSPs) that do not have STIR/SHAKEN and all CSPs *with* STIR/SHAKEN, but who do not have a direct and vetted end user relationship.)
- Such calls can be blocked or the called party can be notified via CNAM.

Dialog is exempt from STIR/SHAKEN implementation requirements on some calls because these calls rely on non-IP technology. See 47 CFR § 64.6304(d).

#### **DIALOG Contact for Robocall Mitigation-Related Issues**

Please direct any questions related to Robocall Mitigation issues to:

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