

Letsdial SG Pte LTD

Robocall Mitigation Program

Letsdial SG PTE LTD is a foreign telecommunications service provider delivering VoIP services and carrying or processing calls utilizing North American Numbering Plan (NANP) resources. As a foreign voice service provider and non-gateway intermediate provider, Letsdial Limited implements this Robocall Mitigation Program in compliance with **47 CFR § 64.6305**, designed to prevent the origination, carrying, or processing of illegal robocall traffic.

Our program incorporates reasonable, risk-based, and multi-layered mitigation controls, along with full cooperation in traceback and enforcement activities.

1. Governance & Compliance Framework

Letsdial Limited maintains a strict zero-tolerance policy toward illegal robocalling, spoofing, and abusive traffic practices.

A designated Compliance Officer is responsible for:

- Maintaining FCC Robocall Mitigation Database (RMD) filings
- Overseeing customer vetting and onboarding procedures
- Coordinating traceback responses
- Conducting quarterly compliance reviews
- All policies are formally documented and reviewed annually or upon regulatory updates.

2. Customer Vetting & Onboarding Controls

Enhanced due diligence is conducted prior to service activation. Mandatory requirements include:

- Executed service agreement containing anti-robocall representations and warranties
- Business registration documents and KYC verification
- Government-issued identification (where applicable)
- Beneficial ownership disclosure
- Operational website and detailed service description
- Traffic use declaration specifying call purpose

Customers are classified as Low, Medium, or High Risk based on operational model, reseller status, traffic profile, and geographic exposure.

High-risk customers require:

- Senior management approval
- Enhanced monitoring
- Traffic volume controls

All submitted documentation is verified against government databases and independent third-party sources where available.

3. Network Authorization Controls

To prevent unauthorized call origination and routing:

- All interconnections require explicit authorization prior to activation
- Defined routing permissions and class-of-service restrictions are applied
- Authentication credentials are periodically reviewed
- Unauthorized connection attempts are automatically blocked

4. Traffic Authentication & Call Validation

Layered validation controls include:

- Automatic blocking of invalid, unallocated, spoofed, or malformed caller IDs (ANI)
- Geographic mismatch detection where technically feasible
- Rejection of known fraudulent number ranges
- Real-time flagging of suspicious CLI patterns

5. Call Analytics & Spam Detection

Letsdial Limited utilizes advanced in-house analytics systems for:

- Real-time anomaly detection
- Behavioral traffic analysis
- Pattern recognition of robocall characteristics

Daily reports are generated to identify suspicious ANIs, routes, and volume irregularities. Confirmed illegal traffic sources are promptly blocked. Detection rules are continuously updated to address evolving robocall methodologies.

6. Blocking & DNC Compliance

Our systems:

- Block invalid or suspicious terminations
- Enforce network-wide Do Not Call (DNC) compliance where applicable
- Apply rate limits to new customers
- Utilize CLI reputation scoring for outbound traffic

7. Zero-Tolerance Enforcement Policy

Customers or upstream partners engaging in illegal robocalling, spoofing, or abusive traffic are subject to:

- Immediate throttling or suspension
- Permanent termination upon confirmation
- Mandatory reseller enforcement actions against originating entities

8. Enhanced Monitoring & Proactive Controls

Continuous monitoring identifies:

- Sudden traffic spikes
 - High short-duration call ratios
 - Sequential dialing patterns
 - Rapid ANI rotation
 - Elevated complaint ratios
- Alerts trigger immediate investigation and potential blocking. A continuously updated database of known robocall actors is maintained for proactive filtering.

9. High-Risk Traffic Controls

High-risk routes are subject to:

- Dynamic behavioral blocking
- Volume-based thresholds
- Complaint-driven restrictions
- Enhanced scrutiny and escalation review

10. Training & Regulatory Updates

Personnel receive ongoing training regarding:

- FCC robocall mitigation requirements
- STIR/SHAKEN obligations
- Industry best practices
- Emerging robocall tactics

11. Customer Education

Customers are proactively informed of:

- FCC compliance obligations
- Prohibitions on spoofing and illegal robocalling
- Consequences of non-compliance

- This promotes responsible network usage.

12. Audit & Continuous Improvement

Letsdial Limited conducts regular audits of:

- Traffic patterns
- Compliance controls
- Mitigation effectiveness
- Policies, onboarding standards, and detection mechanisms are continuously enhanced to maintain regulatory compliance and industry alignment.

STIR/SHAKEN Implementation

Letsdial Limited has implemented the STIR/SHAKEN caller ID authentication framework.

- We certify partial implementation on IP portions of our network.
- We authenticate unauthenticated SIP calls where technically feasible.
- Equivalent mitigation measures are applied on non-IP network segments, including caller ID validation and analytics-based filtering.
- We are registered with the STIR/SHAKEN Policy Administrator.
- We have obtained a Service Provider Code (SPC) token and generate authentication certificates.
- We are actively progressing toward full STIR/SHAKEN implementation across our hybrid network infrastructure.

Traceback & Enforcement Cooperation

Letsdial Limited fully cooperates with:

- The U.S. Traceback Consortium
- The Federal Communications Commission (FCC)
- Law enforcement agencies
- Authorized regulatory bodies
- Traceback requests are acknowledged and responded to within 24 hours.

Actions include:

- Investigation of traffic origin
- Suspension during review
- Permanent termination of confirmed violators
- Maintenance of detailed records for investigative support
- We provide all relevant technical data and cooperation necessary to halt illegal robocall activity.