

Diversify Solution LLC

January, 2026

ROBOCALL MITIGATION PLAN FEDERAL COMMUNICATIONS COMMISSION

Regulatory Basis

The Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act) requires voice service providers to implement STIR/SHAKEN authentication on Session Initiation Protocol (“SIP”) traffic on carrier networks as well as to implement a Robocall Mitigation Plan covering non-SIP Time Division Multiplexing (“TDM”) traffic. Diversify Solutions LLC (“Diversify”) submits this Robocall Mitigation Plan to the Robocall Mitigation Database describing and confirming practices, policies, and procedures to mitigate unlawful robocalling, which include the following:

- (1) Diversify specific reasonable steps to avoid originating illegal robocall traffic as part of this Robocall Mitigation Plan;
- (2) Diversify commitment to respond fully and timely to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers using Diversify service to originate calls; and,
- (3) Diversify intent to participate in industry tradeshows, groups, or consortiums, working to strengthen efforts to combat unlawful robocalling, and additional call verification and authentication solutions.

About Diversify

Diversify (499-A Filer ID: 834640 & OCN: 352K) operates as an intermediate provider (“Intermediate Provider”), neither originating nor terminating calls. As an Intermediate Provider, Diversify only accepts traffic that is fully tokenized; we do not allow untokenized traffic and only offers services to carrier’s that are in compliance with the new FCC requirements. Foreign based carriers are prohibited by Diversify so as to eliminate first hop status into the US Networks and requires gatekeepers to authenticate the calls prior to passing calls downstream to Diversify so as to be in

compliance with the FCC's new rules extending the authentication requirements to the first gateway intermediate providers.

Diversify operates at all times consistent with the rules, regulations and Orders of the Federal Communication Commission ("Commission").

Commission, Law Enforcement, Regulatory Investigation

No Commission, law enforcement, or other regulatory action or investigation exists involving Diversify due to unlawful robocalling or spoofing. Moreover, no law enforcement or Commission action bars Diversify from the Robocall Mitigation Database.

STIR/SHAKEN Obligations for Intermediate Providers

The Commission requires Intermediate Providers to upgrade networks and implement STIR/SHAKEN to authenticate calls in certain situations. Diversify authenticates calls to verify STIR/SHAKEN compliance and then passes the calls onto the appropriate downstream vendors. In addition, the Commission extends several Robocall Mitigation Database filing requirements to all providers including without regard to STIR/SHAKEN implementation status. In particular, the Report and Order requires all providers, including Intermediate Providers and voice service providers that have fully implemented STIR/SHAKEN, to take "reasonable steps to mitigate illegal robocalls" and file certifications along with robocall mitigation plans in the Robocall Mitigation Database.

Diversify has its own Stir/Shaken certification, but as an intermediate carrier, does not insert its own token into that traffic. Calls arriving at the Diversify platform without a token, are rejected.

In addition to implementing full STIR/SHAKEN compliance, Diversify adheres to robocall mitigation practices reasonably expected to significantly reduce the processing or origination of illegal traffic as set forth in the Robocall Mitigation Plan below.

Robocall Mitigation Plan

Diversify utilizes a third-party software as a service switch software platform provider called Veriswitch and in conjunction with this switch platform provider software allows for monitoring outbound voice traffic with the fraud management software to help control unusual traffic patterns and minimize exposure via alerts and actions in real time and help minimize and or prevent the origination of illegal robocalls. The Veriswitch software provides detailed reporting, identifying suspected illegal

robocalls and alerts if the switch possibly originates any calls where the calling number appears invalid, unallocated, on a Do Not Originate list, in the Commission consumer complaint database or maintains a poor reputation score. Diversify will immediately investigate identified calls to determine whether the caller seeks to originate unlawful robocalls. If Diversify determines the calls include attempts to originate unlawful robocalls, Diversify will either warn the customer to cease, block the calling and/or terminate service as consistent with industry standard operating procedures. Diversify is aware of the need to balance any blocking and termination efforts with the goal of preventing the blocking of legitimate calls, particularly those that have a bearing on public safety or health (e.g., a school system sending an alert or law enforcement).

Know Your Customer (KYC)

Diversify follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.
(<https://docs.fcc.gov/public/attachments/DOC-367133A1.pdf>)

A. Goal is to identify initially Customers that may engage in the use of Robocalls. A “Robocall” means an illegal call using an auto-dialer with a random or sequential telephone number generator that delivers an initial prerecorded message or artificial voice that is placed either (i) for telemarketing purposes without the called party’s prior written consent, or (ii) to a wireless number for any purpose without prior express consent. Diversify currently functions solely as an “Intermediate Carrier” (no direct-retail end-users and no international customers for which Diversify would serve as the “first hop” into the U.S.)

B. Customer Screening in KYC form: From each Customer we require the following information which we maintain electronically in Diversify records gathered on an Diversify KYC form:

- Physical location/address.
- Contact person.
- Place of incorporation (state or country).
- Federal tax ID number.
- Type of customer’s account (Wholesale carrier, intermediate carrier, etc.)
- Nature of customer’s business.
- Size of Customer’s business.
- Are auto-dialers used for any purpose?

Contractually, customers must comply with Diversify’s Acceptable Use Policy prohibiting illegal robocalls/spoofing and requiring cooperation with investigations and traceback requests.

Diversify prohibits Foreign-Based customers to eliminate Diversify possible status as “first hop into the U.S.”

C. Know Your Upstream Provider (KYUP) procedures,

Diversify uses upstream interconnection partners that deliver authenticated/tokenized traffic and represent compliance with applicable FCC STIR/SHAKEN and robocall mitigation obligations. Diversify periodically reviews upstream provider status and interconnection performance (including authentication/verification results) and escalates issues where traffic is not delivered in conformance with agreed authentication requirements.

D. Diversify service agreements and contracts require customers to comply with Diversify Acceptable Use Policy which prohibits Robocalls and allows Diversify to report suspicious activity when identified.

Traceback

Diversify responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium, and cooperates with such entities in investigating and stopping illegal robocallers from using Diversify service to originate calls.

Diversify responds fully and within 24 hours to traceback requests from the FCC, law enforcement, and the registered industry traceback consortium and cooperates with these entities and call-chain partners to investigate and stop illegal robocallers. Customers are contractually required to cooperate with traceback and related investigations. Additionally, Diversify reviews and maintains its robocall mitigation program and updates associated plan information within 10 business days when filing information, services, traffic patterns, or risk controls change.

Network Tools Methods For Preventing Illegal Robocalls

Diversify uses the following network tools to combat illegal robocalls:

(1) ANI Management Software: Using provider software, Diversify identifies and blocks originating telephone numbers from sending calls believed to be unlawful based on repeat attempts to reach the network.

(2) Proactive Blocking: Diversify blocks calls from phone numbers on Do-Not

Originate (“DNO”) lists from its providers and Prescott-Martini. In certain circumstances, Diversify also blocks calls that originate from invalid, unallocated, or unused numbers. Diversify customers may also place certain of the inbound-only telephone numbers they use on the DNO list.

(3) No Treatment: This treatment is applied to lawful robocalls so that they can complete. Call types include no-profit, political calls, debt collections, surveys, school, healthcare, emergency notifications, and other lawful call types.

(4) Whitelist: Diversify “whitelists” telephone numbers known to originate valid or legitimate calls (i.e. are valid). Assess Acceptable Customers Via the Following.

- a. Assess information obtained pursuant to KYC, etc.
- b. Verify all business entities and their proclaimed business purpose.

(5) On-Going Customer Monitoring:

Perform initial analysis of new customers’ calling patterns to validate whether they match their defined practices in KYC, etc.

Diversify utilizes various analyzation tools to analyze traffic flow (ASR, ACD, ANI, DNIS, etc.), and generate alerts and optionally take actions based on configured thresholds and any suspicious activity. When the Traffic Analysis reports indicate potential suspicious calling, the appropriate responses will be taken, Diversify takes reasonable and prompt steps that may include:

- traceback/source investigation and evidence collection;
- customer notification and demand to cease;
- blocking specific calling numbers/traffic streams and/or rate limiting;
- temporary suspension pending remediation; and
- termination of service for confirmed or repeated violations.

Diversify seeks to balance mitigation actions with minimizing the risk of blocking lawful traffic, including calls with public safety or health implications.

(6) Customer Contract Terms

- a) Advise customers that they might be subject to random monitoring.
- b) All customers must agree to cooperate with traceback requests.

(7) Customer Relations.

- a) Provide ANI/Caller ID and Blocking capabilities allowing customer block calls from individual numbers or at the network levels.
- b) Provide education and outreach to customers about Robocall avoidance.
- c) Ensure no line item charges for robocall mitigation on customer bills.

DIVERSIFY CERTIFICATION:

I, Rana Parveen, do hereby certify the following:

- a. Diversify operates as an Intermediate Provider neither terminating nor originating calls. Diversify will only accept authenticated traffic that is fully tokenized.
- b. Diversify business name and primary address are as follows:

Diversify Solutions LLC

6514 Artic Way

Inver Grove Heights, MN 55077

Director: Rana Parveen

Email rana.parveen@diversifysolutionllc.com Phone: 612-807-7657

- c. Diversify is not a foreign carrier. Diversify has no affiliates providing services regulated by the FCC.
- d. Diversify has not been subject to FCC enforcement actions.
- e. Diversify does not have any other business name.
- f. Diversify has not previously used any other business name.
- g. The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues follows:
Diversify Solutions LLC
6514 Artic Way
Inver Grove Heights, MN 55077
- h. Diversify serves as an intermediate carrier in the call chain.
- i. Diversify has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- j. Diversify is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- k. Diversify OCN is 352K

Rana Parveen Its Director