



October 28, 2024

Dedicated Professionals, LLC Robocall Mitigation Plan

Dedicated Professionals, LLC is committed to complying with FCC regulations and maintaining the integrity of the telecommunications network. This Robocall Mitigation Plan outlines the specific measures we have implemented to prevent the origination, transmission, and termination of illegal robocall traffic. Our practices are designed to protect consumers, ensure accountability, and foster a trustworthy telecommunications environment through strict monitoring, verification processes, and proactive response protocols.

Company Overview

- **Name:** Dedicated Professionals, LLC
- **d/b/a:** WiFast and Nodes Direct
- **Address:** 200 W Forsyth St, Suite 1310, Jacksonville, FL 32202
- **Contact:** (904) 999-1180
- **Email:** noc@dedipros.com

Company Structure and Principles

Dedicated Professionals, LLC operates as a standalone entity under the management and control of the following individuals and affiliated entities:

- Daniel Stephens – Chief Executive Officer (Principal and Managing Authority)
- Curtis Tyree – Chief Operating Officer

Dedicated Professionals, LLC has no subsidiaries, parent companies, or additional affiliates with direct control or operational influence in managing robocall mitigation efforts.

STIR/SHAKEN Implementation

Dedicated Professionals, LLC has fully implemented the STIR/SHAKEN framework using the Sansay NSS platform. This platform handles caller ID authentication, call signing, and verification, and it enforces Do Not Originate (DNO) lists to block calls from unauthorized or flagged numbers. Calls are signed under the designation "Dedicated Professionals, LLC – 050K," ensuring compliance with caller ID authentication standards.

Know Your Customer (KYC) Procedures

Dedicated Professionals, LLC has implemented robust Know Your Customer (KYC) protocols as part of its robocall mitigation strategy:

- **Customer Vetting:** We follow caller ID authentication best practices, including verification processes recommended by the NANC Call Authentication Trust Anchor Working Group.

This process includes collecting and verifying entity-identifying information to confirm caller legitimacy and operational history.

- **Caller ID Validation:** Our KYC procedures require customers to demonstrate the legitimate right to use their assigned caller IDs. We assign attestation levels based on customer legitimacy and verified information.
- **Contractual Compliance:** All customer contracts include provisions that prohibit illegal robocalls. If any suspicious activity is detected, we issue a warning and work with the customer to resolve the issue. If noncompliance continues, we immediately terminate the customer's services to prevent further misuse of our network. This swift removal policy is integral to our commitment to mitigating illegal robocalls.

Know Your Upstream and Downstream Providers

Dedicated Professionals, LLC ensures compliance with FCC robocall mitigation requirements for both upstream and downstream providers:

- **Upstream Provider Verification:** We accept traffic only from upstream providers registered in the Robocall Mitigation Database, verifying that each has a certified robocall mitigation plan, including customer vetting and monitoring processes.
- **Downstream Provider Verification:** Dedicated Professionals, LLC also verifies that all downstream providers are registered in the Robocall Mitigation Database (RMD). We confirm that each downstream provider maintains an active, compliant robocall mitigation plan to prevent the origination or transit of illegal robocall traffic. Any downstream provider not registered in the RMD is denied service.
- **Traffic Compliance:** We maintain strict contractual terms prohibiting illegal robocalls. Upstream and downstream providers identified as sending illegal or suspicious traffic are notified immediately. If violations persist following an initial warning, we promptly terminate the provider's access to our network.

Robocall Mitigation Program

Our robocall mitigation program integrates the Sansay NSS for enforcing DNO lists and leverages both the Sansay PSM and internally developed monitoring tools to detect, monitor, and alert for suspicious robocall activity:

- **Call Analytics and Monitoring:** The Sansay PSM, along with our internally developed tools, monitors all outbound traffic and provides real-time alerts on unusual patterns. This combination enables our team to identify potential robocall activity and investigate as needed.
- **Mitigation Actions:** Suspicious calls are manually reviewed, with warnings issued to the customer or provider if necessary. If further violations occur, we initiate immediate termination of service to uphold network integrity and compliance.

Traceback Compliance

Dedicated Professionals, LLC fully cooperates with the FCC, law enforcement, and the registered traceback consortium in investigating and stopping illegal robocall traffic:

- **Response Time:** We commit to responding to all traceback requests within 24 hours.
- **Collaboration:** Our team actively works with investigative entities to trace and mitigate illegal robocall traffic using our network.

Certification

I, Daniel Stephens, Chief Executive Officer of Dedicated Professionals, LLC, do hereby certify that under penalty of perjury that the above information is correct and accurate and that Dedicated Professionals, LLC has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.

/s/ Daniel Stephens
Chief Executive Officer
Dedicated Professionals, LLC