



August 26, 2025

Clifton Park, NY, US

FCC Robocall Mitigation Database declaration

DiRAD relies on the continuing extension from STIR-SHAKEN implementation provided under 47 CFR § 64.6304 (d) which exempts from STIR-SHAKEN Caller ID Authentication. DiRAD does not own the network infrastructure to implement STIR-SHAKEN as it is a reseller. Therefore, DiRAD does not have a STIR-SHAKEN implementation obligation.

Our robocall mitigation strategy remains, as it has always been:

1. To refuse to service to purely outbound call centers, by enforcing clauses in our standard terms of service that require balance of the inbound/outbound traffic
2. To technologically limit what CallerID numbers our customers can choose to display on outbound calls to numbers in their inventory, which we validate for ownership prior to adding
3. To use automated alerting as well as manual spot checks on spikes in outbound calling patterns, to detect and stop fraudulent calls
4. To assist other carriers, WITHIN 24 HOURS, in investigating any legitimate complaints of robocalling coming from numbers assigned to us, and to suspend the responsible callers if the reported calls actually originate from DiRAD's telephony providers, until the offending calling activity permanently ceases

Sincerely,

Rami Hachem
Chief Technology Officer, DiRAD Technologies