

Robocall Mitigation Plan

Business Information

Chase Data Corp.
900 S Pine Island Rd.
Ste. 390
Plantation FL 33324

Contact Information

Guillermo Sandoval
VP, Tech Services
8887398218
carriers@chasedatacorp.com

Overview

In the Commission's recent release, *Call Authentication Trust Anchor*, Sixth Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd. 2573 (2023) ("R&O"), it is stated that all voice service providers ("VSPs") must file robocall mitigation plans ("RMPs") that, among other things, outline "reasonable steps" taken to avoid originating illegal robocalls.

In addition to the "reasonable steps," the FCC requires that a RMP include:

- "know your customer" procedures;
- "know your upstream provider";
- ownership information;
- a description of any call analytics system used to identify and block illegal traffic; and
- whether a third-party vendor is used and if so, the name of the vendor.

The FCC previously stated that a RMP is sufficient if the detailed practices in the plan can reasonably be expected to significantly reduce the origination of illegal robocalls and the VSP complies with the practices it describes in its filing.

Purpose

Chase Data Corp. d/b/a DialedIn ("DialedIn") is a small VSP dedicated to stopping illegal calls from traversing the network and monitoring the calls coming into our network.

As certified in the FCC's Robocall Mitigation Database, DialedIn has fully implemented STIR/SHAKEN. In compliance with the R&O, DialedIn submits this RMP and certification.

Know Your Customer ("KYC")

DialedIn's clients must provide a legal company name, a valid EIN, and a physical U.S. (non-P.O. box) address. Additionally, clients cannot place outbound calls with Caller IDs they do not own. Caller IDs must be purchased through DialedIn. If a client requires the use of a specific external Caller ID, they must provide an invoice that matches their company name and the number they wish to use for outbound calls. Additionally, they must sign an addendum stating they have the legal right to use the number for the outbound Caller ID.

DialedIn is a small company; we know our customers and understand their use cases.

Know Your Upstream Providers

In accordance with the Commission's directive in *Advanced Methods to Target and Eliminate Unlawful Robocalls Call Authentication Trust Anchor, Seventh Report and Order In CG Docket 17-59 and WC Docket 17-97, Eighth Further Notice of Proposed Rulemaking In CG Docket 17-59, and Third Notice of Inquiry in CG Docket 17-59* (Rel. May 19, 2023) ¶¶ 49-51, DialedIn provides the following information concerning its upstream voice service carriers.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

DialedIn has master service agreements with its upstream providers and has received assurances in writing from their officials that they have, and will continue to, sign calls transmitted to DialedIn, and will abide by the Commission's STIR/SHAKEN and robocall mitigation rules in all respects when providing voice traffic to DialedIn. DialedIn and its upstream providers have agreed to work together diligently to mitigate all illegal robocalls, including cooperating fully when receiving traceback requests.

Acceptable Use Policy ("AUP")

DialedIn maintains an AUP that subscribers must agree to before being permitted to use DialedIn's software and services. Among other things, the AUP prohibits:

- Use the Site or any Online Community in connection with, or for the purpose of, surveys, contests, solicitation of funds, chain letters, junk email, spamming or any duplicative or unsolicited messages;
- Defame, abuse, harass, invade, threaten or otherwise violate the legal rights of other users;

- Transmit or facilitate the transmission, distribution or dissemination of any Content which is false or misleading; promotes bigotry, racism, hatred or harm against any group or individual; or is obscene or indecent;
- Infringe another's rights such as, but not limited to, intellectual property rights;
- Falsify or delete any copyright management information including material contained in a file that is uploaded;
- Impersonate any person or entity or misrepresent your affiliation with any other person or entity;
- Create a false identity for the purpose of misleading others; or
- Violate any applicable laws, regulations, or codes of conduct.

Ethics and Compliance Hotline

DialedIn has an Ethics and Compliance Hotline ("Hotline"), which is an anonymous reporting mechanism that facilitates reporting of possible illegal, unethical, or improper conduct when the normal channels of communication have proven ineffective, or are impractical under the circumstances.

The Hotline is available to firm partners and employees, as well as clients, contractors, vendors and others in a business relationship with DialedIn, including other member firms whose partners and employees may be working with DialedIn.

DialedIn prohibits retaliation against anyone who, in good faith, reports a possible violation or who participates in an investigation, even if sufficient evidence is not found to substantiate the concern. DialedIn will take appropriate action against any individual determined to be engaging in retaliatory conduct.

Analytics for Monitoring Traffic

DialedIn's platform does not offer a technical capability to make robocalls and does not use third-party vendors for traffic analytics.

Investigate Suspicious Activity

Although DialedIn's platform does not offer a technical capability to make robocalls, it follows Industry Traceback Group ("ITG")-recommended best industry practices and cooperates in traceback and trace forward investigations. To allow for timely and comprehensive responses, DialedIn will devote sufficient resources to provide prompt and complete resources to traceback requests.

Blocking

DialedIn will promptly respond to Do Not Originate requests it receives from the ITG. DialedIn has mechanisms to automatically block suspicious calls using internal analytics. If DialedIn's monitoring systems identify suspected suspicious calling patterns that are confirmed with further investigation, DialedIn will take appropriate action which may include suspending or terminating the subscriber's use of DialedIn's network. DialedIn will cooperate with investigative bodies (provide a single point of contact to address traceback requests from law enforcement including state attorneys general offices), to the FCC, and/or the ITG; as well as documenting requests and actions taken in response thereto.

DialedIn commits to respond within 24 hours to all traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

Plan Updates

This plan and industry best practices must evolve to response to the dynamic nature of mitigating illegal robocalling. DialedIn will monitor industry best practices and continuously improve our internal processes to ensure this plan and our system adapt to this ever-changing issue.

In the event of any material change to this plan, DialedIn will republish it to employees, consultants and contractors and file such an update to the FCC Robocall Mitigation Database within ten (10) days of such update.

Certification of Guillermo Sandoval

I, Guillermo Sandoval, VP of Tech Services of Chase Data Corp. d/b/a DialedIn ("DialedIn"), do hereby certify, under penalty of perjury, the following:

- (1) DialedIn has fully implemented STIR/SHAKEN in the IP portions of its network.
- (1) DialedIn's Business name and primary address are as follows:

Chase Data Corp.
900 S Pine Island Rd.
Ste. 390
Plantation FL 33324
- (2) DialedIn uses the following doing business as name: DialedIn.
- (3) DialedIn has not previously used any other business name.
- (4) The name, title, department, business address, telephone number, and email address of the individual responsible for addressing robocall-related issues are listed in the above robocall mitigation plan.
- (5) The following person owns more than 10% of DialedIn: Ahmed Macklai. This person has not had any licenses denied/revoked by the FCC or been subject to an FCC enforcement proceeding.
- (6) DialedIn's role in the call chain is that of a voice service provider with a STIR/SHAKEN implementation obligation serving end-users.
- (7) DialedIn has not been prohibited from filing in the Robocall Mitigation Database due to an enforcement action.
- (8) DialedIn is not subject to a Commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.
- (9) DialedIn's Operating Company Number is 731K.

/Guillermo Sandoval/

Guillermo Sandoval

March 4, 2026