

Robocall Mitigation Program Description

Entity: Dialoga Group LLC

FCC Registration Number (FRN): 0024815177

A) Description of the "reasonable steps" that Dialoga Group LLC has taken in recent years to prevent illegal trafficking (origination, transit, processing):

Dialoga Group LLC has outsourced the provision of call authentication and verification services through Inteliquent, Inc.

Dialoga Group LLC has taken significant steps to prevent illegal trafficking at all stages of the communication process, including origination, transit, and call processing.

Some of these reasonable steps include:

1. **Implementation of SHAKEN Authentication Services:** Dialoga Group LLC uses SHAKEN authentication services provided by Inteliquent, Inc. to ensure that all calls sent from Dialoga Group LLC's network are properly authenticated and protected from fraud. This is achieved by digitally signing calls using secure private keys and authentication certificates.
2. **Implementation of network security measures:** Dialoga Group LLC and Inteliquent, Inc. have strengthened network infrastructure to detect and mitigate illegal call traffic in real-time. This includes continuously monitoring traffic, enforcing strict security policies, and collaborating with other service providers to share information about threats and malicious traffic patterns.
3. **Staff Training and Awareness:** Dialoga Group LLC has invested in staff training to recognize and respond appropriately to illegal trafficking threats. This includes educating on the latest fraud techniques and promoting a culture of cybersecurity throughout the organization.

These measures implemented thanks to the outsourcing of Inteliquent, Inc.'s services, ensure that Dialoga Group LLC complies with security standards and complies with regulations related to the prevention of illegal call traffic.

B) Description of Dialoga Group LLC measures

Dialoga Group LLC's measures are outsourced to Inteliquent, Inc. and enable it to meet its current obligations related to robocall prevention and protect its customers and end users from fraudulent and nuisance calls.

To comply with current obligations related to robocall prevention, Dialoga Group LLC includes the following services:

1. **Adoption of STIR/SHAKEN technologies:** Dialoga Group LLC uses SHAKEN authentication services provided by Inteliquent, Inc. to ensure that all outbound calls are properly authenticated and protected against call spoofing and other forms of fraud.
2. **Implementation of verification services:** Dialoga Group LLC uses verification services provided by Inteliquent, Inc. to ensure that all incoming calls are authentic and legitimate. This includes the generation of Verstats that indicate the level of confidence in the authenticity of the incoming call.
3. **Advanced Call Analytics:** Dialoga Group LLC benefits from advanced call analytics provided by Inteliquent, Inc. to identify patterns of suspicious behavior associated with robocalls and apply proactive security measures to mitigate the risk of fraud.

C) Description of Dialoga Group LLC analysis systems to identify and block illegal traffic.

Dialoga Group LLC relies on analytics systems provided by Inteliquent, Inc. to identify and block illegal call traffic. These analytics systems from Inteliquent, Inc. comply with industry standards and enable Dialoga Group LLC to effectively identify and block illegal call traffic, thereby protecting the integrity of its network and the experience of its end users.

These systems include:

1. **Real-Time Call Analytics:** Inteliquent, Inc. uses real-time call analytics tools to monitor traffic on the network and detect suspicious activity, such as call spoofing and auto-dialing.
2. **Big Data Analytics:** Inteliquent, Inc. analyzes large volumes of call data to identify patterns and trends associated with illegal trafficking. This is achieved through the use of advanced machine learning algorithms and predictive analytics.

D) Description of Dialoga Group LLC clauses with end users and suppliers to mitigate illegal robocalls

Dialoga Group LLC has established specific clauses in its contracts with both end users and suppliers, in order to mitigate the risk associated with illegal robocalls and ensure compliance with anti-fraud regulations. These clauses include:

1. **Legal Compliance Obligation:** All end users and suppliers are required to comply with all applicable laws and regulations, including those related to the prevention of robocalls.
2. **Incident Reporting:** Dialoga Group LLC is committed to notifying end users and providers of any cybersecurity incident that directly affects the service. This communication is intended for the parties involved to take steps to mitigate robocalls.
3. **Audits and Compliance Reviews:** Dialoga Group LLC reserves the right to conduct regular audits and reviews to ensure that both end-users and suppliers comply with all contractual clauses and requirements related to cybersecurity.
4. **Existence of policies:** Policies are established that cover dealing with security breaches, risk assessment, incident response, and vulnerability scanning.
5. **Security Measures:** Dialoga Group LLC is committed to implementing appropriate security measures and controls to ensure the confidentiality, integrity, and availability of customer information.
6. **Security Systems:** The company will implement an effective Information Security Management System, in accordance with applicable regulations and international standards such as ISO/IEC 27001 or the NIST Cybersecurity Framework.
7. **Antimalware:** The obligation is established to implement anti-virus and anti-malware protection in the Information Systems of Dialoga Group LLC, using the most recent version available and updating it periodically according to the manufacturer's recommendations.