

Digital Lion, LLC.

Robocall Mitigation Plan

December 2024

I. Introduction

1. Digital Lion, LLC. (“**Digital Lion**” or “**Company**”) provides technology support services and lead provider services to its business customers. Its offices are located at: 550 North Brand Blvd., 20th Floor, Glendale, CA 91203. Digital Lion’s services are designed to connect its business clients with consumers who have expressed interested in business clients’ products or services. Digital Lion provides these services using Inteliquent Inc, a Sinch company, as their underlying VOIP provider (“**Sinch**”).
2. Digital Lion provides limited call services for its business clients. It is not a carrier, nor does it provide dial tone, or trunking services. Nevertheless, Digital Lion has taken specific reasonable steps set forth herein to avoid originating illegal robocall traffic as part of its Robocall Mitigation Plan and for submission to the Federal Communications Commission (hereinafter “**FCC**”) Robocall Mitigation Database.
3. Digital Lion certifies that all calls that it originates on its network are subject to its Robocall Mitigation Program.
4. Company’s underlying provider Sinch has implemented STIR SHAKEN and Robocall Mitigation Plans in accordance with the STIR/SHAKEN authentication Framework.

II. Robocall Mitigation

1. Responding to Traceback Requests.

Digital Lion understands that responding to traceback requests is a critical obligation for voice services providers. Digital Lion is committed to supporting efforts by the FCC to trace the origin of suspected illegal robocalls through the chain of interconnected voice service providers and to ensure compliance with the TRACED Act insofar as it may apply to Digital Lion. While the foregoing is true, this may not be applicable due to the Company given its business model of providing limited call services for its business clients. As a lead provider, however, Digital Lion can and will investigate traceback requests using its internal platform/system to assist in identifying the source of illegal or suspicious robocalls by determining where the lead originated (i.e. from which affiliate/marketing partner and from which domain).

Digital Lion will respond fully within 24 hours of its receipt of a traceback request from the FCC, law enforcement agencies, and the Industry Traceback Group (“**ITG**”) or other entity designated by the FCC, and will cooperate with these agencies to investigate and stop any illegal robocallers that use its service to originate calls. Upon receipt of a traceback request, Digital Lion shall: acknowledge its receipt of the request within a timely fashion, within 24-hours of its receipt; conduct an internal investigation to trace the call within out network; review call detail records; document its finding clearly; provide a transparent response sharing details it has learned from its investigation and if applicable, noting any corrective actions taken; maintain records as required by applicable regulations; and where required by the FCC, follow up with any additional reporting requirements.

Digital Lion devotes sufficient resources to providing prompt and complete information to traceback requests. The Company’s point of contact to oversee traceback requests is:

Name	Title	Contact Info
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Cindy-Jo Cometa	VP, Compliance	cindy.c@dot818.com
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If Digital Lion does not have direct access to the call history or call detail records, it will contact its underlying carrier/partner and request that such information be provided within twenty-four (24) hours.

2. Know Your Customer.

Digital Lion has established and implemented a Know Your Customer (“**KYC**”) policy (“**KYC Policy**”) for any new and existing customers to mitigate the risk of illegal robocall traffic originating from its network. The objective of the KYC Policy is to prevent Digital Lion from being used, intentionally or unintentionally, for spoofed or illegal traffic. KYC procedures enable Digital Lion to know and understand its business customers and to ensure each is properly vetted, monitored and verified before being allowed access to Digital Lion’s call services, ultimately helping Digital Lion to better manage unacceptable traffic.

Digital Lion’s end-users are consumers who have submitted their request for a finance product with Digital Lion to be connected to a finance provider within Digital Lion’s network. These end-users provide their express consent to be contacted and provide their phone number to be contacted.

Digital Lion does not provide services to retail or wholesale subscribers and does not accept any inbound calls. All originating voice calls originate with the Company or its vetted affiliates/marketing partners. The Process for onboarding each affiliate/marketing partner is as such:

- Each affiliate/marketing partner completes Digital Lion’s Onboarding Affiliate Questionnaire and provides the following information:
 - Basic company information (i.e., physical address, contact person, state, and year of incorporation, W-9).
 - Principal name and contact information.
 - Information on means by which it generates its leads (i.e., provides domains on which it has its data forms for consumers who are interested in finance products to submit).

Digital Lion’s compliance team conducts an onboarding investigation of each potential affiliate/marketing partner. As part of Digital Lion’s continued oversight measures, it also provides all active affiliates/marketing partners with its Continued Oversight Affiliate Questionnaire annually to inquire about any material changes made to the affiliate's operations. Digital Lion reserves the right to suspend or terminate relationships with affiliates/marketing partners where it sees suspected patterns of fraudulent activity.

By implementing this KYC Policy, Digital lion demonstrates its commitment to regulatory compliance, risk mitigation practices and proactive measures to prevent the transmission of illegal robocall traffic through its network.

3. International Call Originators:

The Company does not sell services to international call originators and does not operate as a foreign carrier.

4. Call Analytics

The Company scrubs against the national Do Not Call list and utilizes its internal suppression list.

5. Other Robocall Mitigation Practices

The Company adds fraudulent lead contact information to its internal suppression lists such that any future lead submissions matching the fraudulent info (i.e., mobile number, email, etc.) will not be permitted.

6. Call Blocking:

This is not applicable as the Company only provides lead generation services.