

ROBOCALL MITIGATION PLAN

D2KH Corp. d/b/a VSTEKS for itself and on behalf of its affiliates (the “Company”) hereby submit this Illegal Robocall Mitigation Plan (the “Plan”) to the Federal Communications Commission (“FCC”) pursuant to the Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence (TRACED) Act.

1. To help reduce the number of illegal robocalls that may originate from our network, effective May 2021, VSTEKS has implemented robocall mitigation efforts to monitor our network and verify that calls originating over our network are from legitimate numbers belonging to a valid VSTEKS customer. This practice has been implemented per FCC mandate. In line with FCC rules, users of VSTEKS’ voice service are prohibited from originating unwanted calls – including illegal and spoofed robocalls - with the intent to defraud, cause harm or wrongly obtain anything of value from the recipient of the call. Violation of these terms can result in suspension or termination of the user’s voice telephone service.
2. The Company has implemented STIR/SHAKEN and has engaged an STI-Certificate Authority (STI-CA) service provider for Company. The STI-CA will interact with the STI-Policy Administrator (STI-PA) on Company’s behalf to ensure that (1) only vetted and approved customers are authorized to sign calls and (2) such customers’ calls are signed exclusively with certificates that have been issued by the national level.
3. The Company’s experienced telecommunications personnel continually monitor our network to identify and mitigate any irregular traffic patterns to reduce fraudulent and/or illegal robocall traffic. When the Company identifies potentially fraudulent, abusive, suspicious, or robocalling traffic patterns; it acts swiftly to mitigate this activity. Mitigation includes, but is not limited to, (1) blocking or rejecting known fraudulent/abusive traffic or invalid calling numbers utilizing the appropriate Session Initiation Protocol (SIP) response codes, (2) blacklisting a known abusive number, (3) tracing the call traffic back to the originating party, (4) reporting instances of irregular traffic activity to our carrier customer, (5) requiring the customer to remediate and detail the ca