



DYL, LLC
400 Corporate Pointe, Suite 850
Culver City, CA 90230
www.DYL.com

ROBOCALL MITIGATION POLICY

I. Introduction

DYL, LLC (DYL) hereby submits this report regarding its implementation of the STIR/SHAKEN call authentication framework and the practices/procedures in place to mitigate illegal robocalls as of June 30, 2021. As an Intermediate provider, DYL refuses traffic from any voice service provider or gateway provider that is not listed in the Robocall Mitigation Database. Every call originating directly through the DYL infrastructure follows intermediate providers practices required by FCC regulation. DYL has not been subject to a commission, law enforcement, or regulatory agency action or investigation due to suspected unlawful robocalling or spoofing.

II. Our Use Policy

In DYL Terms and Conditions, we describe prohibited practices and the corresponding consequences of engaging in those practices. The company makes the policies available on its website to its customers and subscribers. In accordance with the policies, subscribers may not use DYL services to engage in, encourage or promote robocalls, high volume fax transmissions or activity that violates any statute or regulation by FCC. Our Policy specifies that subscriber access to DYL products and / or services may be restricted or suspended for violations, we highly regard compliance with the applicable regulations.

Under our Terms and Conditions, a prohibited practice includes several activities, including: (1) using the service as call center lines for telemarketing campaigns and / or for carrying out and sending advertising, alerts; (2) using the service as a gateway sending bypass type communications; (3) using the service for spam-type messages; (4) using the service for fraudulent, criminal or illegal purposes. If it is detected that the customer engages in any of the aforementioned prohibited practices, DYL reserves the right to pursue the administrative, civil and / or criminal actions that correspond permitted under the law; including, suspend totally or partially, temporarily or permanently the provision of services.

III. Mitigation Procedures

Among other things, DYL is a technology provider to sales professionals. We offer our services as an innovative platform to initiate live, manual calls and texts only, not to robocall. DYL has implemented standards for preventing illegal robocalls, including the following:

Know Your Customer

DYL utilizes the mitigation technique of "Know Your Customer." We maintain a close communication with our subscribers which provides the ability to identify call pattern characteristics. Our systems capture unnatural call patterns associated with robocalling that trigger alerts allowing for apprehension of accounts suspected of illegal activities. Our process of determining the validity of consumers includes acknowledging our policies and collecting information, such as:

- For Residential/Consumer Services: DYL requires customers to provide their full legal name as reflected on government identification, residential address confirmed through verifiable means such as a telephone bill, contact phone number(s) and email address.
- New or renewing customers are also required to affirmatively acknowledge and accept DYL's terms and conditions associated with use of the service. We also consider whether any enterprise customer have been the subject of:
 - Any formal written request from a government agency, subpoena, civil investigative demand, or other complaint.
 - Any lawsuit filed by a regulatory agency, or any other law enforcement action by any other state or federal agency which includes any trade or fictitious names or aliases under which the company operates.
- We aggressively audit new users when they onboard with us, as well as periodically re-audit the same to search for illegal/suspicious behavior.
- We ensure all outbound calls are authenticated from known users who register their phones or softphones in our dialing system.
- We never sell services to resellers.
- As mentioned, our terms of service expressly prohibit illegal robocalls and other illegal practices.

DYL's terms prohibit using the platform to break the law, impersonate another, send bulk unsolicited messages, use "bots," data mine to catalog, download, store or otherwise reproduce or distribute information from our platform.

Mitigating Illegal Traffic

- Our systems communicate through strict firewall allowances
- Alerting/Reporting system for suspicious activity or misuse of services.
- Automated VoIP Black listing to ban/block suspicious or known entities reported to violate FCC regulations.
- Services are rendered in strict fashion unidentified outside DYL infrastructure.

Monitoring/Proactive Fraud Prevention

DYL has instituted additional analytical monitoring of call traffic to detect anomalies from customer baseline. The ways we check for fraud using many factors, including:

- Average length of call
- Total call counts
- Regional call counts
- Individual authentication call checks based on multiple factors
 - Dialing outside user's region—for example, a regional customer in Atlanta calling New York.
 - Sequential/serial number dialing—for example, dialing 3105551234 then 3105551235 then 3105551236.
- Suspiciously rapid dialing—many calls created in a short period of time;
- Check for the originating country of the call; and
- Check for the time of day of the call

IV. Cooperation with the Industry Traceback Group (ITG)

DYL will actively cooperate with the traceback community, including with the FCC, FTC, State Attorney's General, law enforcement officers and the Industry Traceback Group (ITG) to investigate and stop illegal robocalls. DYL will dedicate sufficient resources to provide prompt and complete responses to traceback requests. As mentioned, DYL's traffic originating on its network cooperates with Providers listed on the FCC's Robocall Mitigation Database as having either deployed the STIR-SHAKEN solution or having an appropriate robocall mitigation plan in place.