

April 15, 2024

Via upload to FCC Robocall Mitigation Database

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Robocalling Mitigation Policy

1. Purpose

This Robocall Mitigation Policy outlines the measures and procedures P.A. Dominguez, Inc. implements to detect, prevent, and mitigate the transmission of illegal and unwanted robocalls through our network. Our goal is to protect our customers from fraudulent, deceptive, and unwanted calls while ensuring compliance with applicable laws and regulations, including the TRACED Act and FCC rules.

2. Scope

This policy applies to all voice calls transmitted through P.A. Dominguez, Inc.'s network infrastructure. It covers all employees, contractors, and third-party service providers involved in the operation, maintenance, and management of P.A. Dominguez, Inc.'s voice services.

3. Definitions

- Robocall: An automated telephone call that delivers a recorded message, typically on behalf of a political campaign, marketing company, or fraudulent entity.
- Illegal Robocall: Any robocall made without the recipient's prior express consent, including calls that are fraudulent, deceptive, or otherwise violate federal or state laws.
- STIR/SHAKEN: Standards and protocols adopted by the telecommunications industry to authenticate caller ID information and combat caller ID spoofing.

4. Policy Measures

4.1. Implementation of STIR/SHAKEN

P.A. Dominguez, Inc. has fully implemented the STIR/SHAKEN call authentication framework across our network with ClearIP. This technology enables us to verify the authenticity of caller ID information,

helping to prevent caller ID spoofing and identify potentially fraudulent calls.

4.2. Monitoring and Analysis

We continuously monitor and analyze call patterns on our network to identify and investigate unusual activity that may indicate robocall campaigns. Our analysis includes, but is not limited to, high volume of short-duration calls, sequential number dialing, theft of service, traffic pumping, and high complaint volumes.

4.3. Blocking and Filtering

Based on our analysis and in compliance with FCC rules, P.A. Dominguez, Inc. may block or filter calls that are highly likely to be illegal or unwanted robocalls. This includes calls from invalid, unallocated, or unused numbers, as well as numbers listed on the Do Not Originate (DNO) list.

4.4. Customer Complaints and Feedback

We provide mechanisms for customers to report unwanted calls received on their lines. Customer complaints are an essential component of our monitoring efforts and help refine our blocking and filtering strategies.

4.5. Partner and Third-Party Requirements

P.A. Dominguez, Inc. requires all partners and third-party service providers that route calls through our network to implement similar robocall mitigation practices. We reserve the right to suspend or terminate service to any partner or third party that fails to comply with these requirements.

4.6. Transparency and Communication

We commit to maintaining transparency with our customers regarding our robocall mitigation efforts. This includes providing information on how customers can protect themselves from unwanted calls and how to report them to P.A. Dominguez, Inc.

4.7. Compliance and Cooperation

P.A. Dominguez, Inc. will comply with all regulatory requirements related to robocall mitigation and cooperate with law enforcement and regulatory agencies in investigations related to illegal robocalls.

5. Review and Update

This policy will be reviewed annually and updated as necessary to reflect changes in technology, regulatory requirements, and best practices in robocall mitigation.

6. Contact Information

Customers and partners may report unwanted calls or inquire about this policy by contacting peter@pad.com

This policy is effective as of 01/01/2023. P.A. Dominguez, Inc. reserves the right to modify this policy at any time, with or without notice, as it deems necessary to enhance its robocall mitigation efforts or to comply with regulatory changes.