



Robocall Mitigation Plan

Trace back Co-operation

DA INTERNATIONAL will cooperate in trace back investigations. To allow for timely and comprehensive law enforcement efforts against illegal robocallers, **DA INTERNATIONAL** will dedicate sufficient resources to provide prompt and complete responses to trace back requests from law enforcement and from US Telecom's Industry Trace back Group. **DA INTERNATIONAL** has identified a single point of contact in charge of responding to these trace back requests and will respond to trace back requests as soon as possible or in 24 hours of notification.

- **DA INTERNATIONAL** will require trace back cooperation. For all new and renegotiated contracts governing the transport of voice calls, our policy will specify the use of best efforts to require cooperation in trace back Investigations by identifying the upstream provider from which the suspected illegal robocall entered its network or by identifying our own customer if the call originated in our network.

Subscriber Vetting Practices

• Residential and small business practices

- o **DA INTERNATIONAL** will vet residential and small businesses through regular business practices and obtain billing address, primary residence, or business location.

• Commercial retail end-users

- o **DA INTERNATIONAL** will confirm the identity of commercial customers by collecting information such as physical business location, contact person(s), state or country of incorporation, federal tax ID, and the nature of the customer's business.

- o **DA INTERNATIONAL** has call detail records to determine typical call volume and potential reasons for significant deviations from the usual call volume. **DA INTERNATIONAL** will determine if there are legitimate reasons for any customer making several high volumes, short duration calls. **DA INTERNATIONAL** will contact any commercial business within 24 hours of such deviations to determine legitimate call volumes.

Telephone Number Validation Practices

- Telephone Number Validation is necessary and appropriate when an End-User's right-to-use telephone number is unknown to the VSP. **DA INTERNATIONAL** will validate as essential and mandatory.

International Practices

- **DA INTERNATIONAL** will continue to monitor best practices and implement them as needed.

Ongoing Mitigation Practices

- **DA INTERNATIONAL** will investigate suspicious calls and calling patterns. If **DA INTERNATIONAL** detects a pattern consistent with illegal robocalls, or if **DA INTERNATIONAL** otherwise has reason to suspect illegal robocalling or spoofing is taking place over our network, **DA INTERNATIONAL** will seek to identify the party that is using our network to originate, route, or terminate these calls and take appropriate action. Taking appropriate action may include, but is not limited to, initiating a trace back investigation, verifying that the originating commercial customer owns or is authorized to use the Caller ID number, determining whether the Caller ID name sent to a receiving party matches the customer's corporate name, trademark, or d/b/a name, terminating the party's ability to originate, route, or terminate calls on its network, and notifying law enforcement authorities.

- **DA INTERNATIONAL** has contracted with third-party, Ineloquent, for near-real-time and ongoing robocall mitigation data analytics.

Contact information **DA International Communication Service Private Limited.**

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Sincerely,
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