

Robocall Mitigation Policy



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Business Name: Data Messaging & Communications (DMC) Limited

Author: Colin Cuthbertson

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Contents

Background	1
Purpose.....	2
About Us	2
Our Services.....	2
Call Flows	2
Inbound call flow	2
Inbound call, diverted off switch flow	2
Outbound call flow	3
Carrier Partners	3
Policy	3

Background

Caller ID spoofing is a technique used by scammers to disguise their true phone number and display a fake caller ID on the recipient's phone. This allows them to make it appear as though the call is coming from a trusted source, such as a bank or government agency, in order to trick the recipient into answering the call or providing personal information. Caller ID spoofing is illegal in some countries (including USA).

A **Robocall** is an automated telephone call that delivers a pre-recorded message to the recipient. These calls are typically made in large quantities using computerised auto-dialing systems, and can be used for a variety of purposes, including political campaigning, telemarketing, and debt collection. Many robocalls are considered unwanted or even illegal, particularly those that use deceptive or fraudulent tactics to trick people into providing personal information or making payments.

Call Forwarding with Caller ID is a telephone system feature that allows a user to forward all incoming calls to another phone number whilst presenting the Caller ID of the original caller.

Purpose

Our Robocall Mitigation Policy is designed to stop illegal and bad calls whilst ensuring that good calls can proceed to their ongoing destination unimpeded.

About Us

DMC is an Internet Telephony Service Provider based in the United Kingdom. We provide VoIP telephony services to UK Businesses and their international subsidiaries.

We do not market our services outside of the UK. However, we do work with a number of US based and other multi-national companies and provide services in many different countries around the World.

Our Services

Our services include:

- SIP Trunk
- Telephone Numbers
- Hosted PBX Systems
- Onsite PBX Systems
- Hosted SBC for "Teamware" (e.g. Microsoft Teams, etc)

Call Flows

Telephone calls to / from DMC Customers follow one of three patterns:

Inbound call flow

Public Telephone Network -> Carrier -> DMC SBC -> DMC Customer PBX -> End User

Inbound call, diverted off switch flow

Public Telephone Network -> Carrier -> DMC SBC -> DMC Customer PBX -> DMC

220 High Street, Swansea, SA1 1NW

Tel: 0161 850 4001 | Fax: 0161 850 0126 | Email: info@dmcip.com | Web: www.dmcip.com

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SBC -> Carrier -> Public Telephone Network

Outbound call flow

End User -> PBX -> DMC SBC -> Carrier -> Public Telephone Network

Carrier Partners

DMC use three carriers to route outbound calls originating on our network. The three carriers are:

- Voxbone SA (RMD0003702)
- Vonage (RMD 0018401844)
- Simwood INC (RMD0001616)
- AQL

Policy

DMC is committed to protecting subscribers from unwanted and potentially harmful robocalls. To achieve this goal, we have implemented the following robocall mitigation measures:

1. Registration with the Robocall Mitigation Database (RMD).

- DMC are registered with the RMD (RMD0013003) as a Foreign Voice Service Provider and Gateway Provider as defined by Title 47 of the Code of Federal Regulations (CFR) paragraph 64.6300(c & d).

2. Know Your Customer.

- DMC is a small well-established telecommunications provider that supplies telephony services to business customers (business to business).
- DMC maintains a close relationship with all its customers and subscribers and has a screening process for new clients that includes background checks, identification checks, credit checks and usage checks.
- DMC maintain an internal database of customers which is constantly updated as customer details change.
- DMC customers present a low risk for perpetrating illegal robocalls.

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3. General Prohibition Against Illegal Robocalling.

- All customers are obliged to comply with our terms and conditions of business which prohibit illegal and nuisance calls. Breaches of our policies will lead to service disconnections.
- We have contracts with all our carrier partners and are obliged to comply with their terms and conditions of business which prohibit illegal and nuisance calls. Breaches of their policies will lead to service blocks.

4. Telephone Number Verification

- All customer's telephone numbers are hosted by one of our carrier partners and right to use these telephone numbers is verified and documented.
- Customers wishing to use a CallerID provided by a third party may do so by special arrangement with DMC and in accordance with our terms and conditions of business. The right to use these telephone numbers is verified and documented
- Outbound calls originating on our network can only be made using a verified CallerID. That is, a caller ID that has been checked and allocated to the customer account by DMC.

5. STIR / SHAKEN implementation

- DMC have partially implementation STIR / SHAKEN protocols.
- DMC is a small business as defined by Title 47 of the Code of Federal Regulations (CFR) paragraph 64.6304 (a 2) and is working towards full STIR / SHAKEN implementation by 31st July, 2025
- DMC are in the process of obtaining a STIR/SHAKEN certificate and updating our platform to digitally sign all traffic originating on our network to ensure that the calls are given Full (A) Attestation meaning that the service provider has authenticated the customer originating the call and they're authorised to use the calling number.
- DMC attempt to route calls originating from US CallerID's via the carrier partner that hosts that number on our behalf (i.e. The Primary Carrier) to ensure that the call will be given at least Partial (B) Attestation meaning that the service provider has authenticated the customer originating the call but can't verify they're authorised to use the calling number.

- In the event that the primary carrier network is unavailable, calls will be routed via a secondary carrier network to ensure that the number will be given Partial (B) Attestation or Gateway (C) Attestation (depending on carrier policy) meaning that the service provider has authenticated from where it received the call, but can't authenticate the call source.
- For calls forwarded with CallerID, DMC will present a verified number by default. By special arrangement with individual customers and subject to our terms and conditions of business, DMC may forward incoming calls back out to the public telephone network with the original CallerID. In this case, the call will be given Gateway (C) Attestation meaning that the service provider has authenticated from where it received the call, but can't authenticate the call source.

6. Opt-Out Mechanism

- All customer PBX systems have an opt-out mechanism allowing subscribers to be added to a Do Not Call list.

7. Realtime Network Monitoring

- DMC have realtime monitoring in place on all customer PBX systems and Carrier systems checking for call throughput, call concurrency and fraudulent activity.
- DMC and our Carrier Partners employ IP Authentication, rate limiting and toll fraud prevention to reduce the risk of unauthorised robocalls.

8. Traceback and Enforcement Co-Operation

- DMC will actively cooperate with the traceback community including the FCC, law enforcement, and The Industry Traceback Group (ITG) to investigate and stop illegal robocalls.
- DMC will dedicate sufficient resources to provide prompt and complete responses to traceback requests.

9. Blocking Calls

- Calls from individual customers can be blocked instantly if fraudulent calls, bad calls or robocalls are detected by our monitoring systems or reported by our Carrier Partners, Subscribers or other official organisation.