



Robocall Mitigation Program Description

Deltapath, Inc.

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1 Introduction

Deltapath is committed to protecting consumers from illegal robocalls by implementing a comprehensive robocall mitigation program. This document describes the measures taken to comply with the requirements of 47 CFR § 64.6305 and provides details on policies, systems, and procedures that ensure compliance with federal regulations.

2 Robocall Mitigation Policies

Deltapath has implemented the following policies and procedures to ensure that new and renewing customers do not originate illegal robocalls:

Customer Vetting:

- Conduct identity verification (company EIN and address proof) and background checks for all new and renewing customers.
- Evaluate historical call behavior to identify high-risk customers.

Contractual Agreements:

- Require all customers to adhere to acceptable and fair use policy, which prohibits originating illegal robocalls.
- Include termination clauses for policy violations or illegal robocall activity.

Ongoing Monitoring:

- Monitor customer traffic for anomalous calling patterns indicative of illegal robocall activity.
- Actively review high call-volume customers for compliance.

3 Call Analytics Systems

To detect and mitigate illegal robocalls, Deltapath uses its own Deltapath Unified Communications Platform's built-in reporting and analytics feature to analyze and detect suspicious calling patterns

Real-Time Blocking:

- Deploy real-time blocking capabilities for identified illegal calls.
- Use STIR/SHAKEN] technology to verify caller ID authenticity.

Reporting and Alerts:

- Provide detailed reports and alerts on flagged traffic to relevant teams for immediate review and action.

4 Upstream Provider Compliance

Deltapath maintains rigorous procedures to verify and monitor upstream providers:

Provider Due Diligence:

- Verify upstream providers' compliance with robocall mitigation regulations.
- Require upstream providers to submit their Robocall Mitigation Database (RMD) certification.

Traffic Monitoring:

- Regularly analyze traffic originating from upstream providers for indications of illegal robocalls.
- Conduct periodic audits and request updated compliance documentation as necessary.

5 Role in the Call Chain

Deltapath serves as a voice service provider. In this role, our responsibilities include originating, transmitting, or processing voice calls, while ensuring compliance with all robocall mitigation requirements.

6 STIR/SHAKEN Implementation Status

Deltapath has fully implemented STIR/SHAKEN on the IP portions of our network. Specific details include:

- Network Coverage "STIR/SHAKEN has been fully implemented across 100% of our IP-based voice network, ensuring caller ID authentication and verification for all IP-originated and IP-terminated calls."

Call Types:

- It applies to both inbound and outbound calls within your IP network.
- There are no TDM traffics

Caller ID Authentication:

- Outgoing calls are signed with an 'A' attestation level based on the verification of the caller's identity and their right to use the phone number. Our platform prevents users from modifying their caller ID. Outbound caller ID is restricted to either the user's DID or main number registered under their entity.
- Incoming calls are verified by our upstream provider and the attestation is passed to us in the SIP headers to confirm caller ID integrity before routing / filtering to end user.
- Validate call forwarding calls to ensure only the original caller ID or the called party DID can be sent out.

7 Operational Monitoring and Maintenance

We continuously monitor call traffic to ensure the integrity of caller ID authentication and suspicious outbound calls are not originating from our platform.