



DIAL Robocall Mitigation Plan

Robocall Mitigation Program

DIAL enforces a comprehensive robocall mitigation program to ensure all voice traffic on our network adheres to the highest standards of integrity, fully compliant with FCC regulations.

Key Strategies:

1. **STIR/SHAKEN Implementation:** Fully deployed across our network to authenticate caller ID information, significantly mitigating caller ID spoofing risks.
2. **Advanced Call Analytics:** Continuous monitoring of call patterns to identify and scrutinize potential illegal robocall activities, with proactive measures for anomaly detection.
3. **Proactive Call Blocking:** Implementation of stringent call blocking for numbers flagged for illegal activities, informed by both internal analysis and external sources including regulatory bodies.
4. **Rigorous Customer Vetting KYC Process:** Mandatory verification procedures for new customers, ensuring legitimacy and compliance. This includes:
 - Verification of identification for all clients. And we only work with US based clients.
 - Requirement for information consistency across contract names, company incorporation documents, and credit card details.
 - Comprehensive review of the customer's business nature and operational addresses.

Traceback Cooperation:

- Commitment to responding within 24 hours to traceback requests from the FCC, law enforcement, and industry traceback consortium, aiding in the investigation and mitigation of illegal robocalls.

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Mitigation and Auditing Efforts:

- Monitoring call traffic metrics (CPS, ASR, ACD) for abnormalities, with specific call path limits for PBX-related accounts adjusted only for verified business needs.
- Establishment of client use-case prior to granting product access, ensuring appropriate use and mitigating misuse.

Compliance and Communication:

- Designation of specific email channels to prioritize communications from service providers, regulatory entities, and to facilitate swift response to compliance inquiries.

Terms of Use:

- All clients must agree to DIAL's Terms of Use, which are rigorously enforced to maintain network integrity and compliance with legal standards.

Conclusion:

DIAL remains dedicated to combating illegal robocalls through stringent measures and continuous improvement of our mitigation strategies. We pledge full cooperation with regulatory bodies, law enforcement, and the industry to uphold the integrity of telecommunications services.