

DIGICOM ITALIA (DI) ROBOCALL MITIGATION PROGRAM

STIR/SHAKEN Implementation; Extension

DI has implemented the STIR/SHAKEN authentication framework on the IP portions of its network. For those portions of its network that are not capable of STIR/SHAKEN (i.e., TDM / non-IP technology that cannot initiate, maintain, carry, process, and terminate SIP calls), DI relies on the continuing extension provided under 47 C.F.R. § 64.6304(d).

Traceback Requests

DI will fully and timely respond to all traceback requests from the FCC, civil and criminal law enforcement, and the registered industry traceback consortium. DI will cooperate with such entities in investigating and stopping any illegal robocallers that use DI's voice services to originate illegal calls.

Subscriber Due Diligence

DI conducts routine reviews of all new and renewing subscribers to confirm the identity of the subscriber (i.e., "know your customer"), including noting the service address, billing address, contact information, nature of the subscriber's business, and other relevant business information (as applicable). DI will retain call detail records to determine typical call volumes, and DI will contact subscribers if it detects any patterns that indicate any suspicious call behavior.

Traffic Analytics

DI uses software-based analytic tools to monitor voice traffic on its network in real-time to identify suspected unlawful activity. The software provides detailed reporting based on suspicious traffic, including bursts of high call volumes, low durations, low reputation scores, and sequential dialing patterns.

Terms & Conditions; Acceptable Use Policy

As a condition to service, subscribers are subject to enforceable terms of service, including an Acceptable Use Policy, that prohibit subscribers from using their voice service to originate illegal robocalls. In the event of unlawful use of the service, DI will take appropriate action to remediate the situation, including initiating a traceback investigation, verifying subscriber's usage, issuing a warning to the subscriber, suspending the subscriber's service, terminating the subscriber's service, and notifying law enforcement, as such measures may be deemed appropriate.

In addition to implementation of the STIR/SHAKEN framework, DI is continuously evaluating the voice marketplace for solutions to provide the best voice service to our customers. DI may offer certain incoming robocall mitigation services (e.g., call blocking) to our customers. We look forward to supporting the FCC's objectives of combating unwanted robocalls.