

## **BDK Inc Robocall Mitigation Compliance with TRACED Act**

BDK Inc (the “Company”) is committed to cooperating with the Federal Communications Commission (FCC), law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that it learns are using our service to originate calls or transit calls into the United States and territories.

The Company has fully implemented STIR/SHAKEN.

Coredial LLC (the “Vendor”) is STIR/SHAKEN certified and can be found in the Robocall Mitigation Database. The vendor provides the company with access to an administrative portal where phone systems can be monitored, maintained, and stopped when necessary.

The Company commits to fully responding within 24 hours to all traceback requests from the ITG, the TPTG, the FCC, and law enforcement. The Company shall cooperate with these groups to investigate and stop any illegal robocallers from using Company’s service to carry or process illegal calls. When notified by the FCC’s Enforcement Bureau, the Company shall work with the Vendor to block and report identified illegal traffic, and any substantially similar traffic, on an ongoing basis (unless Company’s investigation determines that the traffic is not illegal) when Company receives actual written notice of such traffic from the Enforcement Bureau. If Company determines that the identified traffic is not illegal, Company shall provide the Enforcement Bureau with an explanation as to why Company reasonably concluded that the identified traffic is not illegal, and what steps it took to reach that conclusion.

The Company reserves the right to refuse traffic from any party at any time where robocalling or use of originating numbers that are not valid or they are not authorized to use has occurred or is suspected. The Company is able to block the originating number(s), terminating numbers(s), trunk(s) or customer, including termination of customer relationship to prevent robocalling, invalid originating number or spoofed origination number transiting the Company’s networks.

The vendor implements a variety of internal and 3<sup>rd</sup> party tools to check for Do Not Originate (DNO) numbers. In addition, the Vendor utilizes a combination of internal tools and third-party solutions to detect invalid phone number formats, area codes and unassigned number blocks. The Vendor also utilizes data analytics to detect and investigate irregular and unexpected calling patterns, originating number use against customer profiles.

The Company enforces a Know Your Customer (KYC) requirement to access its networks. This process includes manually verifying the customer’s identity through an in-person visit to confirm legitimacy. In cases where a manual visit is not feasible, alternative verification methods may be employed to assess authenticity. Until all verification steps are completed, client access to systems is restricted to ensure compliance and security.

BDK Inc has two upstream providers from which it receives voice traffic:

1. PayG LLC dba SkySwitch

Arborcrest 1, 751 Arbor Way  
Suite 150  
Blue Bell, PA 19422  
Phone: 747.777.8100  
Email: support@skyswitch.com

2. CoreDial LLC

Arborcrest 1, 751 Arbor Way  
Suite 150  
Blue Bell, PA 19422  
Phone: 215.297.4400  
Email: cdsupport@skyswitch.com