

DBB Solutions LLC's Robocall Mitigation Plan

DBB Solutions LLC ("DBB Solutions") submits this Robocall Mitigation Plan ("Plan") pursuant to 47 C.F.R. § 64.6305. This Plan describes DBB Solutions' efforts to mitigate illegal robocalls consistent with the FCC's rules. DBB Solutions may modify, add, delete, or otherwise alter any part of this Plan in order to respond to changes in its business, technologies, needs, industry best practices, or any applicable law or regulations. DBB Solutions will update this Plan within ten (10) business days following the date of any changes to the Plan.

STIR/SHAKEN Implementation Status

DBB Solutions is a voice service provider that provides voice over internet protocol ("VoIP") services to end-user customers. Although DBB Solutions is a voice service provider that has direct relationships with its end-user customers, DBB Solutions resells white labeled VoIP service obtained from an underlying wholesale provider. DBB Solutions does not operate its own voice switches and does not operate switches leased from another entity. Nor does DBB Solutions control number porting or call trunking associated with calls originating from or terminating to DBB Solutions' customers. As such, DBB Solutions "lack[s] control over the necessary network infrastructure to implement STIR/SHAKEN" and does not have a STIR/SHAKEN implementation obligation.¹

Terms of Use/Acceptable Use Policies

DBB Solutions maintains a Subscription Agreement which all users must agree to and comply with in order to use DBB Solutions' products and services. Under the Subscription Agreement, users may only use the service for lawful purposes and unlawful use is subject to immediate disconnection at the sole and absolute discretion of DBB Solutions. Moreover, the Subscription Agreement prohibits use of the service in any way that is threatening, abusive, harassing, defamatory, libelous, deceptive, fraudulent, invasive of another's privacy, or any similar behavior. DBB Solutions also reserves the right to transmit information regarding the alleged unlawful, harassing, abusive, defamatory or other harmful use to the appropriate authorities for investigation and prosecution, and by accepting the Subscription Agreement, users agree to those terms.

Specific to robocalls, the Subscription Agreement also prohibits the use of the service for auto-dialing, continuous or extensive call forwarding, telemarketing (including, without limitation, charitable or political solicitation or polling), fax or voicemail broadcasting or fax or voicemail blasting. Moreover, DBB Solutions reserves the right to immediately disconnect or modify the end-user's service if DBB Solutions determines (in its sole and absolute discretion) that the end-user's use of the service is inconsistent with normal residential usage patterns.

Beyond termination for the above referenced reasons, DBB Solutions reserves the right to suspend or discontinue service to any customer at any time in its sole discretion.

¹ See *Call Authentication Trust Anchor, Implementation of TRACED Act Section 6(a) – Knowledge of Customers by Entities with Access to Numbering Resources*, Report and Order and Further Notice of Proposed Rulemaking, 35 FCC Rcd 3241, 3260, ¶ 40 (2020) (excluding from a STIR/SHAKEN implementation obligation those providers that lack control over the necessary network infrastructure); See *Call Authentication Trust Anchor*, Second Report and Order, 36 FCC Rcd 1859, 1868, ¶ 19 (2020).

New and Renewing Customer Vetting Process

DBB Solutions' business model as a bulk provider of internet and digital phone service limits the ability for unknown individuals or entities to become users of DBB Solutions' voice services. DBB Solutions' services are only available for purchase from the resident of multi-tenant environments (*e.g.*, apartment buildings) with whom DBB Solutions separately has contracted for the provision of bulk internet services to residents of the property. As a result, the potential subscriber base of DBB Solutions is limited in scope and all individuals who sign up for DBB Solutions' voice services can be easily identified.

In addition to the unique business model that mitigates against the use of its service by unknown individuals, DBB Solutions maintains procedures that apply to the signing up of new and renewal of existing customers of voice service. New and renewing users are required to provide to DBB Solutions, and maintain, accurate and complete information about themselves, including the requirement to provide at least one form of identification, *i.e.*, driver's license, social security number, debit/credit card number.

Upstream Provider Vetting Process

DBB Solutions relies exclusively on its underlying wholesale provider for handling calls that originate from or terminate to DBB Solutions' end-user customers. DBB Solutions has ensured that its underlying wholesale provider is listed in the Robocall Mitigation Database and has measures in place to vet the providers with which the wholesale provider exchanges voice traffic.

Authentication, Monitoring, and Mitigation

As a reseller of services obtained from one underlying provider, DBB Solutions relies on its underlying wholesale provider for authenticating, monitoring and mitigating calls that originate from or terminate to DBB Solutions' end-user customers. DBB Solutions relies on its provider's call analytics systems to identify and mitigate unlawful or suspected robocall traffic originated by DBB Solutions' customers.

Moreover, the nature of DBB Solutions' services that are offered exclusively to residents at a limited number of multi-tenant environments mitigates the potential for the use of DBB Solutions' services for the origination of robocall traffic.

Traceback Commitments

DBB Solutions commits to respond fully, within 24 hours, to all traceback requests from the FCC, law enforcement and the industry traceback consortium, and to cooperate with such entities in investigating and stopping illegal robocallers that use DBB Solutions' service to originate, carry, or process illegal robocalls.

Ownership and Management

DBB Solutions is affiliated with Diamond Communications LLC. Information regarding Diamond Communications LLC's executive leadership team is available [here](#).