

# Dial Phone Limited

Level 7, Suite C, World Trust Tower, Central, Hong Kong  
www.dialphone.ai | info@dialphone.ai

## Robocall Mitigation Plan and Compliance Program

(47 CFR § 64.6300–64.6305 Compliance) — Revised

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**Revision note:** This version supersedes the plan dated 20 February 2026. It has been updated to reflect operational, STIR/SHAKEN attestation, TCPA, Do-Not-Call (DNC), traceback, call-role, and traffic-monitoring procedures clarified during interconnection review.

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### 1. Company Identification

**Legal Name:** Dial Phone Limited

**OCN:** 988K

**FRN:** 0035672963

**FCC Form 499 Filer ID:** 836966

**RMD ID:** RMD0021998

**Authorized Officer:** Aahil Hussain, President

**Original Plan Date:** 20 February 2026

**Revision Date:** 2 July 2026

### 2. Provider Classification and Call Role

Dial Phone Limited is a Hong Kong-based wholesale telecommunications provider offering international voice interconnection, SIP trunking, and enterprise communications, including UCaaS (Unified Communications as a Service) and CCaaS (Contact Center as a Service), to licensed carriers and enterprise customers. It operates as a non-gateway foreign wholesale voice service provider in accordance with 47 CFR § 64.6300, carrying wholesale voice traffic on an intermediate basis between upstream carriers/enterprise customers and downstream interconnection partners.

For the avoidance of doubt, Dial Phone Limited's call role is as follows:

- **Intermediate provider:** Dial Phone Limited receives calls from upstream providers and passes them to downstream carriers. It does not create call sessions on behalf of end users.
- **Not an originating provider:** Dial Phone Limited does not hold U.S. numbering resources and does not originate calls onto the U.S. network as an originating voice service provider.
- **Not a gateway provider:** Dial Phone Limited is not the first U.S.-based point of entry for foreign-originated traffic and does not perform the U.S. gateway function under 47 CFR § 64.6300(a)(9).
- **Not a terminating provider:** Dial Phone Limited does not deliver calls to end-user subscribers.

Dial Phone Limited does not originate robocall campaigns and does not originate autodialed or prerecorded-message traffic.

### 3. Traffic Origination Profile

Dial Phone Limited operates as a wholesale voice aggregator and does not originate calls. The company receives voice traffic from its customers and authorized upstream carrier partners and passes it to downstream interconnection partners on an intermediate basis. Traffic transmitted over the network consists of legitimate business communications originated by upstream providers and their customers.

The company does not knowingly originate or transmit illegal robocalls or high-risk outbound call-center traffic. All customers and upstream partners undergo Know-Your-Customer (KYC) and Know-Your-Upstream verification prior to service activation. Consistent with 47 CFR § 64.6300–64.6305, Dial Phone Limited applies robocall mitigation measures to all traffic it accepts and transmits.

#### **4. Prior Regulatory Actions Disclosure and FCC Cooperation**

During the preceding two (2) years, Dial Phone Limited has not been subject to any FCC enforcement action, robocall investigation, Caller ID spoofing violation, or regulatory citation related to robocall mitigation.

Dial Phone Limited will fully cooperate with and support the Federal Communications Commission, its Enforcement Bureau, and other authorized law-enforcement and regulatory authorities in connection with any FCC enforcement action, robocall investigation, Caller ID spoofing matter under the Truth in Caller ID Act (47 U.S.C. § 227(e)), or regulatory citation. Such cooperation includes responding promptly to inquiries and orders, preserving and providing relevant call detail and authentication records, identifying upstream and downstream sources, and implementing corrective or mitigation measures as directed.

In accordance with 47 CFR § 64.6305, Dial Phone Limited will update its FCC Robocall Mitigation Database filing within ten (10) business days of any material change, including any such enforcement action, investigation, violation, or citation.

#### **5. STIR/SHAKEN Implementation and Attestation Policy**

Dial Phone Limited has implemented STIR/SHAKEN call-authentication handling appropriate to its role as an intermediate (aggregator) provider. Because Dial Phone Limited does not hold U.S. numbering resources and is not the originating provider, it does not itself sign calls or apply attestation on behalf of customers.

Dial Phone Limited requires STIR/SHAKEN authentication where supported by the originating provider and the interconnection. Its attestation policy is as follows:

- Customers and upstream carriers are contractually required to deliver STIR/SHAKEN-signed traffic, carrying a valid SIP Identity (PASSporT) header applied by the originating provider, wherever the originating network and interconnection support it.
- Unsigned traffic is subject to enhanced monitoring, risk analysis, and routing restrictions. Where an interconnection partner requires signed traffic only, unsigned traffic is rejected and blocked.
- C-level (gateway) attestation is accepted only where permitted by the applicable interconnection agreement. Where a downstream partner prohibits C-attestation, such traffic is blocked or rerouted, and exchanged traffic is restricted to A-level (full) and B-level (partial) attestation.
- Where an Identity header is present, Dial Phone Limited preserves and passes it unaltered to the downstream provider so that attestation integrity is maintained end-to-end.

For traffic that lacks STIR/SHAKEN due to legacy TDM, non-IP interconnection, or origination in jurisdictions where STIR/SHAKEN is not deployed, Dial Phone Limited applies enhanced monitoring, Caller ID validation, Do-Not-Originate (DNO) blocking, and traceback enforcement, consistent with FCC foreign-provider mitigation expectations. Where a partner requires that no unsigned traffic be exchanged, Dial Phone Limited honors that requirement and rejects such traffic accordingly.

## **6. Network Monitoring and Traffic Analytics**

Dial Phone Limited maintains continuous monitoring of signaling and traffic patterns associated with U.S.-terminating calls. Monitoring capabilities include:

- Anomalous call-pattern detection
- Spoofed or invalid Caller ID identification
- Burst-traffic detection
- Robocall indicator analytics
- Automated anomaly scoring and machine-learning traffic analysis to identify abnormal patterns and potential robocall indicators
- Automated alerting and investigation workflows

Suspicious traffic may be blocked, rate-limited, or immediately suspended pending investigation.

Dial Phone Limited retains the following records for a minimum of two (2) years: call detail records (CDRs), SIP signaling logs, STIR/SHAKEN verification logs and Identity (PASSporT) header information, Caller ID authentication records, and customer KYC documentation.

## **7. Customer and Service Controls**

### **7.1 Service Restrictions**

Dial Phone Limited prohibits customers whose traffic profile consists primarily of outbound call-center or robocall-type activity. Traffic profiles must reflect legitimate business communications.

### **7.2 Caller ID Authentication**

Customers may transmit only Caller IDs they are authorized to use. Dial Phone Limited validates number ownership or authorization prior to activation.

### **7.3 Do-Not-Originate (DNO) Protection**

Dial Phone Limited blocks calls using numbers listed on the FCC Do-Not-Originate registry and other known invalid, spoofed, unallocated, government, or emergency numbering ranges.

### **7.4 Know-Your-Customer (KYC)**

Customer onboarding includes legal-entity verification, identity validation, ultimate beneficial ownership (UBO) verification, OFAC and sanctions screening, service use-case assessment, robocall risk screening, and execution of a compliance agreement. High-risk customers are rejected or prohibited. These controls align with 47 CFR § 64.1200(n)(4).

### **7.5 Reseller Verification**

Wholesale resellers must certify legitimate telecommunications operations. Dial Phone Limited verifies business presence, domain ownership, and service legitimacy prior to activation.

## **8. TCPA Compliance**

Dial Phone Limited requires all customers and upstream partners to comply with the Telephone Consumer Protection Act (47 U.S.C. § 227) and its implementing rules at 47 CFR § 64.1200. As an intermediate wholesale carrier, Dial Phone Limited does not itself initiate telemarketing, autodialed, or prerecorded-voice campaigns; however, it imposes the following contractual and operational requirements on traffic sources:

- Customers must obtain and retain any prior express consent (or prior express written consent for telemarketing) required by the TCPA before initiating autodialed or prerecorded calls.
- Customers must observe permissible calling-time restrictions and caller-identification requirements.
- Traffic that violates TCPA consent or disclosure requirements is prohibited. Sources generating such traffic are subject to investigation, suspension, or termination.

## **9. Do-Not-Call (DNC) Compliance**

Dial Phone Limited supports compliance with the National Do-Not-Call (DNC) Registry and applicable state DNC requirements. Because Dial Phone Limited does not itself place telemarketing calls, DNC compliance is enforced contractually and operationally against the parties that originate traffic:

- Customers conducting any solicitation traffic must scrub called numbers against the National DNC Registry and honor internal company-specific do-not-call requests.
- Customers must maintain records demonstrating DNC compliance and provide them on request.
- Traffic exhibiting patterns consistent with DNC violations may be blocked, rate-limited, or suspended pending investigation, and non-compliant sources may be terminated.

## **10. Upstream Provider Compliance**

Dial Phone Limited receives traffic from enterprise customers and wholesale upstream carriers. Upstream providers are required to maintain robocall mitigation programs, prohibit illegal robocalls and spoofing, comply with FCC requirements, deliver STIR/SHAKEN-signed traffic, and cooperate with traceback requests. Dial Phone Limited periodically reviews upstream traffic patterns and may suspend or block non-compliant sources.

## **11. Traceback Cooperation**

Dial Phone Limited fully cooperates with traceback requests from U.S. carriers, the USTelecom Industry Traceback Group (ITG), and regulatory authorities. The company commits to:

- Responding promptly, generally within 24 hours, or sooner where requested by the USTelecom Industry Traceback Group or other authorized entities
- Providing call detail records and routing data
- Identifying upstream sources
- Suspending or terminating violators

## **12. Fraud and Scam Traffic Controls**

Beyond general robocall mitigation, Dial Phone Limited maintains dedicated controls to detect and block known fraud and scam call patterns, including:

- Wangiri (one-ring) and callback-fraud detection

- Government-impersonation scams (e.g., IRS and tax-authority impersonation)
- Bank and financial-institution impersonation
- Neighbor spoofing and Caller ID manipulation
- Snowshoe traffic spread across many numbers to evade detection
- Traffic pumping and access-stimulation schemes

Detected fraud sources are immediately suspended pending investigation and may be terminated. Fraud indicators are continuously updated based on industry intelligence and traceback outcomes.

### **13. Continuous Mitigation Improvement**

Dial Phone Limited continuously enhances its robocall mitigation framework through traffic-trend analysis, robocall-indicator updates, customer and upstream audits, industry cooperation, and regulatory monitoring.

### **14. Compliance and Update Commitment**

Dial Phone Limited commits to maintaining accurate FCC Robocall Mitigation Database filings, updating this Robocall Mitigation Plan within ten (10) business days of any material change, and completing annual FCC RMD recertification by March 1, in accordance with 47 CFR § 64.6305.

### **15. Officer Certification**

I, Aahil Hussain, President of Dial Phone Limited, certify under penalty of perjury that the information contained in this Robocall Mitigation Plan and in the FCC Robocall Mitigation Database filing is true, accurate, and complete to the best of my knowledge.

Dial Phone Limited has implemented reasonable and effective measures to mitigate illegal robocall traffic in accordance with 47 CFR § 64.6300–64.6305 and commits to ongoing compliance with all applicable FCC rules.