

Digital Lead Performance, Inc.

Robocall Mitigation Plan

Date: November 5th 2024

Digital Lead Performance, Inc. (DLP) utilizes [REDACTED] as its underlying voice services provider. Accordingly, DLP relies on procedures, policies, and safeguards implemented by [REDACTED] to ensure that DLP's residential and business customers are sufficiently protected against robocall and spoofing activities.

Traceback

DLP responds to all traceback requests from the Commission, law enforcement, and the registered traceback consortium and cooperates with such entities in investigating and stopping any illegal robo-callers that use its service to originate calls.

STIR/SHAKEN

On behalf of DLP, [REDACTED] already authenticates voice traffic using STIR/SHAKEN. Voice traffic that DLP originates is subject to robocall mitigation program described below.

Robocall Mitigation Program

[REDACTED] uses call analytics to monitor DLP's outbound voice traffic in real-time to prevent the origination of illegal robocalls. The software identifies calling patterns that would indicate robocall activity, such as an unusual number of calls from a telephone number and/or an unusual number of short-duration or incomplete calls. The software provides detailed reporting identifying suspected illegal robocalls. The software also provides alerts where the calling number is invalid, unallocated, on a Do Not Originate list, in the FCC consumer complaint database or has a poor reputation. There is an immediate investigation of any identified calls to determine if the caller was attempting to originate unlawful robocalls. If it is determined that the caller was attempting to originate unlawful robocalls, then DLP either warns them to stop or terminates their service as appropriate pursuant to its business policies.