

Robocall Mitigation Program

DURKETA LLC, L.L.C.

DURKETA LLC is a registered limited liability headquartered at 5701 Truxtun Ave., Suite 220, Bakersfield, California 93309, USA. The company is having OCN number 284L under IPES category providing wholesale VOIP services to its clients.

DURKETA LLC certifies that all of the calls that it originates on its network are subject to a robocall mitigation program consistent with 47 CFR § 64.6305(a), which shall include reasonable steps to avoid originating illegal robocall traffic and shall include a commitment to respond fully and within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls. The filer also certifies that any prior certification has not been removed by Commission action and it has not been prohibited from filing in the Robocall Mitigation Database by the Commission, and that it has fully implemented the STIR/SHAKEN authentication framework across its entire network and all calls it originates are compliant with 47 CFR § 64.6301(a)(1) and (2).

DURKETA LLC is a voice service provider with a STIR/SHAKEN obligation acting as a wholesale provider originating calls and service end-users.

DURKETA LLC has not been prohibited from filing a certification in the Robocall Mitigation Database and has not been the subject of an FCC, law enforcement, or regulatory agency action or investigation related to illegal robocalling or spoofing or a deficient Robocall Mitigation Database filing.

I am signing this robocall mitigation program as Executive of the organization. I have a significant understanding of the operations of the company, its clients and its vendors. I have been involved in the preparation of the policies and the strategies of the organization so I can provide a reasonably sufficient and reliable information about the organization.

This Robocall Mitigation Program includes detailed practices that can reasonably be expected to significantly reduce the origination of illegal robocalls. DURKETA LLC does not knowingly or through negligence serve as the originator for illegal robocall campaigns. DURKETA LLC is taking the steps outlined below to prevent the origination or transit of illegal robocalls on our network.

Specific Reasonable Steps Taken to Avoid Originating Illegal Robocall Traffic

The following details the robocall mitigation practices currently in place at DURKETA LLC.

PREVENTION OF ORIGINATION OF ILLEGAL CALLS

As an inter-connected VOIP service provider, DURKETA LLC takes affirmative, effective measures to prevent new and renewing customers from originating illegal calls. These steps include employing call analytics, monitoring call originating volume, investigating customers expected to have high volume traffic, and including and enforcing terms in contracts disallowing illegal robocalls.

Call Analytics

DURKETA LLC has integrated call analytics into our network to monitor voice traffic for patterns consistent with illegal robocall campaigns and fraudulent calls. We use the data on our switch to perform large data analytics exercises to identify suspicious patterns of robocalls.

We monitor the calls flow; the trend of the different customers calling pattern and investigate any suspicion of illegal robocalls. This way it is helpful for us to differentiate legal traffic from fraudulent and unlawful customers.

Call Origination Volume Monitoring and Follow-Up Steps

The data analytics from our switch helps in identifying the problematic calls originating which might be a result of illegal robocalls. The resulting action plan is determined based on the analysis. Various options are available – whether to block, redirect, or provide a warning to the customer.

We monitor the data to find out if same number is being called multiple times in a day. In such case the client is warned and sometimes service is blocked.

We also monitor instant increase in number of calls being generated from any particular customer, which might be a sign of illegal robocalls.

We listen to the call recordings on a sample basis of various customers to find out if these are genuine calls or illegal robocalls. Based on the call recording, we take further line of action.

If DURKETA LLC observes that a business customer is originating an unusually high number of calls per day on average on a single line, it is our policy to determine the reason for the call volume. If there is not a reasonable explanation for the call volume, DURKETA LLC can block the subscriber. Customers engaging in originating illegal robocalls are subject to termination.

Know-Your-Customer Policy

DURKETA LLC investigates potential business customers seeking access to high-volume origination services to ensure that the expected traffic will not be illegal or consist of illegal robocalls.

Among other data points collected and, as appropriate, verified, as part of those processes DURKETA LLC gathers the following customer-identifying facts and circumstances:

- Customer business name,
- state or country of incorporation,
- physical business location,
- contact person(s) and contact information, and, for wholesale customers:
- FCC 499 Filer ID, FCC RMD entry, and exemption certificate.

If necessary and appropriate, DURKETA LLC also conducts credit checks and/or checks references with a prospective customer's other carrier-suppliers.

Contracts Allow for Termination

All business customers sign contracts that specify that customers "will always comply with all applicable laws and regulations and the...policies as updated by Provider from time to time." In addition, clients must "use all services provided pursuant to this entire agreement in a lawful manner and shall comply with all federal, state and local statutes, regulations, and orders." All contracts contain a provision for termination in case of illegal use of services. To combat robocalls, DURKETA LLC added the following to its Terms and Conditions for all relevant business contracts:

If DURKETA LLC determines its services are being used to support illegal robocalling activity, or if Client fails to cooperate in addressing robocalling activity, DURKETA

LLC may immediately and at its sole discretion block outgoing calls and/or terminate the Master Services Agreement for failure to comply with all applicable laws and regulations."

It is DURKETA LLC's policy to immediately block suspected robocalls while investigating to ensure they are legal. If the calls are determined to be illegal, DURKETA LLC will not hesitate to enforce these provisions.

Traceback

DURKETA LLC commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the registered traceback consortium. DURKETA LLC

cooperates fully with such entities in investigating and stopping any illegal robocallers that use the company's service to originate, carry, or process illegal robocalls.

KNOW-YOUR-UPSTREAM PROVIDER

DURKETA LLC has "know-your-upstream provider" procedures in place designed to mitigate illegal robocalls. DURKETA LLC exercises due diligence before accepting traffic from an upstream provider. It understands its sources of call traffic by maintaining a limited list of vetted and contracted upstream providers. DURKETA LLC routinely monitors the Robocall Mitigation Database to ensure that the upstream providers are in the FCC's Robocall Mitigation Database.

CALL ANALYTICS

DURKETA LLC is obligated to provide a detailed description of all call analytics systems it utilizes to detect and block illegal or suspicious traffic. This includes disclosing the use of any third-party analytics platforms or service providers, along with the names of those vendors. As outlined in previous sections, DURKETA LLC employs both internal monitoring tools including use of SIPNAV's analytics and custom inhouse built open sips switch system and may engage with external vendors to analyze call patterns, detect anomalies, and flag potential robocall activity. Upon request by the Commission or other relevant authorities, DURKETA LLC will furnish detailed information regarding the specific analytics tools and methodologies used, including any third-party systems involved.

Certification

On behalf of DURKETA LLC, L.L.C., I certify that all calls that originate on DURKETA LLC's network are subject to the attached Robocall Mitigation Plan, that any prior certification has not been removed by FCC action nor has DURKETA LLC been prohibited from filing in the Robocall Mitigation Database, and DURKETA LLC has fully implemented STIR/SHAKEN on any IP portions of its networks.