

Paydit Inc. Robocall Mitigation Program Policy

1. Purpose

The purpose of this document is to outline the Robocall Mitigation Program of Paydit Inc., in compliance with **47 CFR § 64.6305(c)**. Paydit Inc. is committed to ensuring that its network is not used to carry or process illegal robocall traffic. This program sets forth our policies and procedures to prevent, identify, and mitigate unlawful robocall activity, while facilitating secure, human-initiated communications.

2. Company Overview

Paydit Inc. provides voice communication services where all calls are initiated by humans and connected to predetermined business recipients. The company does not utilize automated or predictive dialing technologies, nor does it process calls involving prerecorded or artificial voices. Paydit Inc. is dedicated to maintaining a secure and trustworthy network for its users and stakeholders.

3. Scope

This program applies to all calls processed or carried by Paydit Inc.'s network. It includes steps to mitigate illegal robocall traffic, ensure compliance with regulatory requirements, and cooperate with the Federal Communications Commission (FCC), law enforcement, and the Industry Traceback Group (ITG).

4. Robocall Mitigation Measures

Paydit Inc. has implemented the following measures to identify, prevent, and mitigate illegal robocalls on its network:

1. Network Monitoring and Traffic Analysis

- Continuous monitoring of network traffic to detect abnormal patterns, such as high call volumes, repetitive call destinations, or unusual call durations, which may indicate illegal robocall activity.
- Use of analytics tools to flag and investigate suspicious traffic for further action.

2. Customer Verification

- Robust Know Your Customer (KYC/KYB) procedures to verify the legitimacy of all clients and users before they are allowed to access Paydit Inc.'s network.

- Ongoing periodic reviews of customer activity to ensure compliance with company policies.

3. Call Authentication

- While Paydit Inc. has not implemented the STIR/SHAKEN framework due to the nature of its operations, it ensures that its network is protected from spoofed caller IDs and works to minimize unauthorized call origination.

4. Response to Traceback Requests

- Paydit Inc. is committed to responding fully and promptly (within 24 hours) to traceback requests from the FCC, law enforcement, and the ITG.
- Cooperation includes providing call records and other necessary information to identify and mitigate the source of illegal robocall traffic.

5. Internal Policies and Training

- Implementation of internal policies and employee training to educate staff on recognizing and addressing potential robocall threats.
- Regular updates to the mitigation program to align with evolving regulatory requirements and industry best practices.

5. Compliance and Commitment

Paydit Inc. certifies that:

- It will fully cooperate with the FCC, law enforcement, and the ITG in investigating and stopping illegal robocall traffic.
- It will respond to all traceback requests within 24 hours.
- It does not generate or carry any calls that are automated, use prerecorded or artificial voices, or otherwise meet the definition of “robocalls” as outlined in **47 CFR § 64.1200(f)**.
- All prior certifications to the FCC have not been removed by Commission action, and Paydit Inc. has not been prohibited from filing in the Robocall Mitigation Database.

6. Program Updates and Review

Paydit Inc. will review its Robocall Mitigation Program periodically to ensure continued compliance with FCC regulations and effectiveness in preventing illegal robocall traffic. Updates to this policy will be communicated to all relevant stakeholders as needed.

Approved By:
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President
Paydit Inc.

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