

Robocall Mitigation Plan

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1 Contents

Robocall Mitigation Plan	1
1 Contents	2
2 Company Introduction	3
3 Robocall Mitigation Filling.....	4
3.1 Filling of Robocall Mitigation Database	4
3.2 Filing of ICONECTIV.....	4
4 Robocall Mitigation Plan.....	5
4.1 KYC	5
4.2 Right to Terminate Customer	5
4.3 Robocall Mitigation Registered Providers.....	5
4.4 DNO	6
4.5 National DO NOT CALL Registry.....	6
4.6 No SPOOFING	6
4.7 NOC Department.....	6
4.8 CPS Limitations on Trial	7
4.9 Upcoming Steps to avoid robocall Traffic.....	7

2 Company Introduction

DIALER21 was formed in 2024 and is registered in USA as “DIALER21 LLC”. We are headquartered in Canada and has its presence in United States and Canada. We are aiming to expand around the globe with passage of time.

DIALER21 is a global provider of Complete Call Center Solutions. Our company is known for providing best contact center solutions around the globe with support. End users benefit from the company services and they grow their businesses using intelligent solutions provided by us. Contact Centers completely feel secure when using our products as we protect them by making them oblige all the rules and regulations. This helps us achieve long term relationships with End Users and our Vendors.

DIALER21 completely abides all the regulations indicated by FCC and is full complaint with FCC and FCC indicated entities. Therefore, we also provide solutions to FCC registered users and depending upon the service, DIALER21 may serve as Voice Service Provider or Gateway Provider³ Robocall Mitigation Filing

3 Robocall Mitigation Filing

3.1 Filing of Robocall Mitigation Database

We have submitted our Robocall Mitigation Plan to the FCC’s Robocall Mitigation Database in accordance with regulatory requirements. This plan outlines our efforts to minimize the origination of illegal robocalls.

3.2 Filing of ICONECTIV

We are in the process of completing our registration with the STI Policy Administrator (STI-PA) via iconectiv to obtain an SPC token for STIR/SHAKEN call authentication.

4 Robocall Mitigation Plan

4.1 KYC

We perform Know Your Customer (KYC) validation before activating any customer accounts. This involves identity verification, usage intent confirmation, and customer background checks.

4.2 Right to Terminate Customer

We reserve the right to terminate any customer service if there is evidence or suspicion of illegal robocalling activity or violation of our terms.

4.3 Robocall Mitigation Registered Providers

We work only with trusted upstream providers and partners who are registered with the Robocall Mitigation Database to maintain call delivery integrity.

4.4 DNO

We cross-check numbers against the Do Not Originate (DNO) list to avoid originating calls from numbers known to be used for spoofing.

4.5 National DO NOT CALL Registry

We educate our customers on compliance with the National Do Not Call (DNC) registry and promote best practices in lawful outreach.

4.6 No SPOOFING

Our systems monitor Caller ID integrity, and we take proactive measures to prevent spoofing or manipulation of ANI values.

4.7 NOC Department

Our Network Operations Center (NOC) is responsible for monitoring traffic and ensuring timely response to anomalies, abuse reports, and traceback requests.

4.8 CPS Limitations on Trial

We enforce CPS (Calls Per Second) limits during trials to prevent abuse and ensure quality of service for all customers.

4.9 Upcoming Steps to Avoid Robocall Traffic

We plan to continue improving mitigation measures by implementing advanced fraud detection, automating DNO filtering, and enhancing STIR/SHAKEN compliance over time.

Exhibit A

Company Name or Trade Name	FRN
DIALER21 LLC	0036808061

Voice Service Provider Role in the Call Chain

DIALER21 LLC acts as an Originating Voice Service Provider, originating SIP-based VoIP traffic on behalf of its end-user customers and sending the traffic to upstream carriers for delivery.

Gateway Provider STIR/SHAKEN Obligation

At the time of filing, DIALER21 LLC acknowledges its role as a Gateway Provider with STIR/SHAKEN obligation under FCC rules. While STIR/SHAKEN is not yet implemented, the company intends to do so upon obtaining SPC token access and will update FCC records accordingly.

Operating Company Number (OCN) Clarification

DIALER21 LLC does not currently hold an Operating Company Number (OCN). As a VoIP provider utilizing upstream carrier infrastructure, an OCN is not required for STIR/SHAKEN participation or FCC Robocall Mitigation Database certification. The company operates under its FRN.

Certification Declaration

As of the date of filing, DIALER21 LLC certifies its status under the FCC Robocall Mitigation Database as a Voice Service Provider with no STIR/SHAKEN implementation currently in place and has filed a mitigation plan in accordance with 47 CFR § 64.6305(a). The company commits to full cooperation in traceback requests and intends to implement STIR/SHAKEN in the near future.

Future Gateway Provider Consideration

At the time of filing, DIALER21 LLC is operating solely as a Voice Service Provider. Gateway Provider operations may be considered in the future, at which time the Robocall Mitigation Database filing will be appropriately updated in accordance with FCC requirements.

STIR/SHAKEN Exemption Statement (per FCC 47 CFR § 64.6304)

The company is a non-facilities-based VoIP provider relying on upstream carriers for call termination. Pursuant to 47 CFR § 64.6304, the company is temporarily exempt from full STIR/SHAKEN implementation. DIALER21 LLC has filed a robocall mitigation plan in accordance with 47 CFR § 64.6305(a) and is committed to implementing STIR/SHAKEN upon obtaining SPC token access. The company will update its filing accordingly at that time.