

dollu Ltd.

C/o dollu Ltd, Sonipat, HR
131001
+91-7775002222
compliance@dollu.com
www.dollu.com
DOLLU LTD

March 12, 2025

Gaurav

Corporate Compliance Manager
dollu Limited
C/o dollu Ltd, Sonipat, HR 131001

Company Name: Dollu Limited

Business Type: Foreign-Based Telecommunications Provider

STIR/SHAKEN Participation: Not Applicable

Primary Contact: compliance@dollulimited.com

Robocall Mitigation Plan

1. Overview

Dollu Limited is an international telecom provider based outside the United States. While we are not directly interconnected with the U.S. IP-based PSTN and therefore **not eligible to implement the STIR/SHAKEN authentication framework**, we are fully committed to preventing the origination or transmission of illegal robocalls that may enter the U.S. telecommunications ecosystem through our platform.

This Robocall Mitigation Plan outlines the alternative steps Dollu Limited has implemented to detect, reduce, and block illegal robocall traffic in compliance with **FCC 47 CFR § 64.6305(c)** for foreign-based carriers.

2. No STIR/SHAKEN Participation

As a foreign-based entity not operating under a U.S. OCN and not originating IP-based traffic directly into the U.S. network, Dollu Limited is **not eligible to participate in the STIR/SHAKEN framework**. Nonetheless, we operate with a strong focus on call authenticity and traceability using other technical and operational safeguards.

3. Robocall Mitigation Practices

Although we do not utilize STIR/SHAKEN, Dollu Limited has established robust, multi-level safeguards to prevent illegal robocall activity through our network:

A. Customer Due Diligence & KYC

- We **require all customers to undergo full KYC verification** using internationally accepted identity verification tools (e.g., ID documents, proof of business registration, utility bills).
- **Business customers** must submit official incorporation documents and regulatory licenses (where applicable).
- We screen potential clients using **global fraud and compliance databases** before account activation.

B. Strict Customer Agreements

Every customer must agree to the following conditions:

- **Terms of Use & Anti-Robocall Policy:** Prohibits transmission of any illegal or fraudulent robocalls.
- **Service Suspension Clause:** Allows Dollu Limited to suspend or terminate service if suspicious traffic is detected.
- **Audit Cooperation Clause:** Requires customers to fully cooperate in any traceback or fraud investigation.

C. Real-Time Traffic Analysis

Our VoIP switching systems include **real-time fraud detection tools** that perform:

- **Call Pattern Recognition:** Detects unusual bursts of short-duration calls, repetitive dialing behavior, and call spikes to specific regions or prefixes.
- **Reputation Checks:** All outbound numbers (CLIs) are checked against:
 - Known spam lists
 - Do Not Originate (DNO) registries
 - Industry complaint databases

Suspicious calls are either blocked automatically or flagged for manual review.

D. CLI and Route Restrictions

- Only **verified or pre-approved CLIs** are allowed to transmit traffic.
- Calls using **invalid, spoofed, unallocated, or premium-rate CLIs** are automatically rejected.
- Customers may use custom CLIs only after **passing a call-back verification step**.

E. Blacklisting and Whitelisting

- We maintain **real-time updated blacklists and DNC compliance filters** to block:
 - Calls to U.S. numbers listed on national and carrier-specific DNC lists
 - Calls from blacklisted international ANI prefixes
- Whitelisted CLIs are monitored for behavioral anomalies and removed if misuse is suspected.

E. Blacklisting and Traffic Blocking

Our systems maintain:

- A **network-wide blacklist** of known spam ANIs
- Dynamic blocking of calls to numbers on recognized DNC registries
- Immediate call blocking if flagged by our traffic scanners or external threat intelligence feeds

F. Traceback & Law Enforcement Cooperation

Dollu Limited responds promptly to traceback requests from the **FCC**, the **Industry Traceback Group (ITG)**, and U.S. enforcement agencies.

- We guarantee a **response within 48 hours** of any official traceback request.
- We maintain **detailed call records, metadata, and routing logs** to support traceback efforts.
- In confirmed cases of illegal traffic, we take immediate action and provide full cooperation with enforcement entities.

G. Enforcement & Penalties

In the event a customer is found to be violating our robocall policies:

- **Stage 1:** Traffic is suspended pending review.
- **Stage 2:** The Account is investigated; the customer is required to submit documentation and an explanation.
- **Stage 3:** If violations are confirmed, service is terminated and the customer is blacklisted.

We maintain internal logs of all violations and, when necessary, report the customer to the appropriate telecom regulators in their jurisdiction.

4. Plan Review & Continuous Monitoring

- We perform **quarterly reviews** of our robocall mitigation policies and revise them based on emerging threats and regulatory changes.
- Our monitoring systems are updated **weekly** with fresh reputation data, spam heuristics, and call routing blacklists.
- All team members handling fraud, compliance, and monitoring are trained on **global robocall threats and U.S. compliance requirements**.

5. Summary

Although Dollu Limited does not implement STIR/SHAKEN due to our foreign status and technical scope, we have built a resilient robocall mitigation framework that is proactive, compliant, and constantly evolving. We stand in full support of global efforts to reduce the harm caused by illegal robocalls and remain committed to securing the telecommunications environment.

✉ For questions or inquiries related to this plan, please contact:

Compliance Team, Dollu Limited

Email: compliance@dollulimited.com

Sincerely yours,

Gaurav