

Robocall Mitigation Plan

Compliant with FCC Standards

1. Introduction

In compliance with Federal Communications Commission (FCC) regulations, "ADVANCED DIGITAL CONSULTING, INC." has established a **Robocall Mitigation Plan (RMP)** to prevent the origination of illegal robocalls on its network. As required by the FCC, this plan:

- Details reasonable steps taken to mitigate illegal robocalls.
- Ensures cooperation with traceback investigations.
- Is filed in the **FCC Robocall Mitigation Database**.

This document outlines ADVANCED DIGITAL CONSULTING, INC.'s policies, procedures, and technical measures to combat illegal robocalls.

2. Subscriber Verification & Authentication

A. Know Your Customer (KYC) Policies

To prevent fraudulent use of its services, ADVANCED DIGITAL CONSULTING, INC. implements strict **subscriber identity verification** procedures.

New Subscribers

All new subscribers must undergo identity validation:

- **Online Signup:** A confirmation email is sent to verify the subscriber's identity.
- **Telephone Signup:** A callback is initiated to confirm the provided phone number.

Existing Subscribers

Authentication methods include:

- **Caller ID Validation:** Automatic detection of registered caller IDs.
- **PIN Authentication:** Required if caller ID validation fails.
- **Activity Logging:** All call originations are logged with subscriber details.

B. Acceptable Use Policy (AUP)

All subscribers must agree to ADVANCED DIGITAL CONSULTING, INC.'s **AUP**, which prohibits:

- Spoofing or falsifying caller ID information.
- Violating federal, state, or local laws.
- Engaging in fraudulent or illegal robocalling activities.

Enforcement: Violations may result in **service suspension or termination**.

3. Caller ID & Telephone Number (TN) Validation

A. TN Authorization

- ADVANCED DIGITAL CONSULTING, INC. directly manages assigned TNs and tracks them in an inventory system.
- If a TN is **not managed by ADVANCED DIGITAL CONSULTING, INC.**, the subscriber must provide a **Letter of Authorization (LOA)** proving ownership.

B. Call Attestation

- ADVANCED DIGITAL CONSULTING, INC. verifies the calling party number against its TN database.
- Calls are **only attested** if the TN is properly validated.

4. Traffic Monitoring & Anomaly Detection

ADVANCED DIGITAL CONSULTING, INC. employs **dynamic traffic analysis** to detect suspicious calling patterns, including:

- **Unusual call volumes** (e.g., spikes in short-duration calls).
- **High-frequency dialing** (back-to-back calls).
- **Anomalies in call duration & destination patterns.**
- **Excessive unique destination numbers** in a short timeframe.

Automated Alerts: Unusual activity triggers **real-time alerts** for investigation.

5. Investigation & Mitigation Procedures

A. Traceback Cooperation

- ADVANCED DIGITAL CONSULTING, INC. **contractually requires** subscribers to cooperate with traceback requests.
- A **dedicated point of contact (POC)** handles law enforcement, FCC, and **Industry Traceback Group (ITG)** requests.

B. Suspicious Activity Response

When illegal robocall activity is detected:

1. **Call Detail Records (CDRs)** are reviewed.
2. **Subscriber account activity** is audited.
3. **Direct contact** is made with the subscriber for validation.
4. If fraud is confirmed, **immediate blocking or termination** occurs.

C. Call Blocking Measures

- **Do Not Originate (DNO) compliance:** Blocks numbers flagged by ITG.
- **Internal blacklisting:** Suspends calls from confirmed fraudulent sources.

6. Plan Maintenance & Compliance Updates

- ADVANCED DIGITAL CONSULTING, INC. **continuously reviews** industry best practices to enhance its RMP.
- **Material changes** to this plan will be:

- Communicated to employees and contractors.
- **Filed with the FCC within 10 days** of updates.

7. Conclusion

ADVANCED DIGITAL CONSULTING, INC. is committed to **preventing illegal robocalls** through **strict authentication, real-time monitoring, and rapid response protocols**. This plan ensures compliance with **FCC regulations** and fosters a **trusted communications ecosystem**.