

One International Investment Inc DBA Parsi Digital AB

Robocall Mitigation Program Description

1. Executive Summary

At PARSI DIGITAL, we take a proactive and multi-dimensional approach to combat illegal robocalls, fraudulent spoofing, and unwanted call traffic. Our **Call Protection Initiative** is registered with the **Federal Communications Commission (FCC) Robocall Mitigation Database (RMD)** and is designed to:

- **Prevent** illegal robocalls from entering or exiting our network.
- **Detect** suspicious call patterns in real time using AI-driven analytics.
- **Respond** swiftly to fraudulent activity through automated blocking and traceback cooperation.
- **Adapt** to evolving threats with continuous updates to our mitigation strategies.

This document outlines our compliance with **FCC regulations (47 CFR § 64.6305)** and details our robust call protection framework.

2. Provider Classification & Regulatory Compliance

2.1 FCC Registration & Service Classification

- **FCC Registration Number (FRN):** 0031440506
- **Provider Type:**
 - ☒ **Voice Service Provider** (Serving end-users, wholesale origination, or both)
 - ☐ **Gateway Provider** (Handling foreign-originated calls)
 - ☐ **Non-Gateway Intermediate Provider** (Transit provider)
- **STIR/SHAKEN Implementation Status:**
 - ☒ **Fully Deployed** (All calls authenticated)
 - ☐ **Partially Implemented** (Exemptions claimed under FCC Rule § ____)

2.2 Legal & Industry Compliance

Our program aligns with:

- **The TRACED Act** (Mandating STIR/SHAKEN implementation).
- **FCC Robocall Mitigation Database Requirements** (47 CFR § 64.6305).
- **Industry Traceback Group (ITG) Standards** for call investigation.
- **USTelecom's Best Practices** for robocall mitigation.

3. Multi-Layered Call Protection Strategy

3.1 Call Authentication & Verification

We employ **STIR/SHAKEN call authentication** to ensure legitimate callers:

- **Full Attestation (A-Level):** Applied to verified PARSI DIGITAL-originated calls.
- **Partial Attestation (B/C-Level):** Used for legacy systems or non-IP calls.
- **Tokenized Device Reference (TDR):** Enhances mobile call validation.

Non-Compliant Call Handling:

- Calls failing authentication undergo **additional screening** before termination.
- Repeated offenders are **flagged for manual review** or **blocked entirely**.

3.2 Real-Time Fraud Detection & AI Monitoring

Our **AI-powered traffic analysis system** identifies:

- **High-Risk Call Patterns:**
 - Sudden call volume spikes (>10,000 calls/hour).
 - Invalid or unallocated phone numbers.
 - Spoofed calls (neighbor spoofing, IRS/SSA impersonation).
- **Automated Alerts:**
 - Notifications sent to network security teams for rapid response.
 - Integration with **FCC Do Not Originate (DNO) lists** and **industry blocklists**.

3.3 Call Blocking & Network Enforcement

Automated Mitigation Actions:

- **Immediate Blocking:**
 - Calls from known fraudulent numbers.
 - Calls with "Invalid" STIR/SHAKEN attestation.
- **Traffic Restrictions:**
 - Suspicious callers are **rate-limited** pending investigation.
 - Repeat offenders face **permanent termination**.

Traceback & Law Enforcement Cooperation:

- We fully comply with **FCC, ITG, and law enforcement traceback requests**.
- Call detail records (CDRs) are provided within **24 hours** of a valid request.

4. Ongoing Compliance & Risk Management

4.1 Customer & Partner Due Diligence

- **Know Your Customer (KYC) Checks:**
 - Business verification for high-risk clients (VoIP resellers, call centers).
 - Mandatory compliance agreements for all partners.
- **Whitelisting & Exemption Review:**
 - Legitimate callers (e.g., healthcare, emergency alerts) are whitelisted.
 - Exemptions are documented and reported to the FCC.

4.2 Recordkeeping & Audits

- **3-Year Call Log Retention:** Ensures traceability for investigations.
- **Biannual Third-Party Audits:** Independent verification of compliance.

4.3 Consumer Protection & Reporting

- **FCC "Do Not Call" Registry Compliance:** Scrubbing against opt-out lists.

5. Certification & Contact Information

5.1 Compliance Officer Declaration

"PARSI DIGITAL certifies that this Call Protection Initiative meets all FCC robocall mitigation requirements, including STIR/SHAKEN implementation where applicable. Our systems are continuously monitored and updated to combat emerging threats."