



June 2nd , 2025

Via Online Filing

Federal Communications Commission

45 L Street NE

Washington, DC 20554

RE: Robocall Mitigation and Certification-An update

To Whom It May Concern,

This letter shall serve as formal certification that Dvash-IT, LLC ("V3 Communications"), a New York limited liability company, has not implemented the STIR/SHAKEN authentication framework on any portion of its network, and all of the calls that originate on its network are subject to a robocall mitigation program consistent with paragraph (a) of this § 64.6301.

All traffic originating are subject to robocall mitigation program as carried by or our authorized STIR/SHAKEN carriers and ISPs

The mitigation program includes the following steps:

1. Prevention – Our carrier is working vigorously to prevent unlawful robocalls originating from our network. There is a stringent screening process that prevent customers with potentially fraudulent robocalling traffic from becoming customers.
2. Mitigation - Once an unlawful robocall campaign is detected, Our carrier takes several steps to stop all current and future unlawful calls. They have developed call blocking tools that prevent calls with specific unlawful ANI/'FROM' TN characteristics from traversing their network. Carrier personnel regularly analyzes network traffic looking for unlawful robocall campaigns and utilizes call blocking tools when appropriate. Carrier



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personnel regularly analyzes network traffic looking for unlawful robocall campaigns and utilizes our call blocking tools when appropriate. They also utilize several systems and proprietary processes to detect and block unlawful robocalls that have the following types of ANIs, defined by the FCC as unlawful:

- a. Unallocated: A valid NPA NXX XXXX in the North America Numbering Plan but is NOT assigned to a carrier nor in the LERG. Any call that contains a phone number in the ANI / From field that has not yet been released for public consumption from the NANP.
- b. INVALID NUMBER: A complete telephone number (TN) that is NOT VALID, but of the correct format [2-9][0-9][0-9] [2-9][0-9][0-9] [0-9][0-9][0-9][0-9] (i.e., 10 digits in length, 1st and 4th are [2-9] all others are [0-9]. Any call that contains a character string of digits or letters that doesn't fully comply with E.164 formatting and the Local Exchange Routing Guide (LERG). This includes ANI / From fields with all digits of the same number, or anything less than 10 valid digits assigned from the NANP
- c. INVALID NUMBER: A complete telephone number (TN) that is NOT VALID, but of the correct format [2-9][0-9][0-9] [2-9][0-9][0-9] [0-9][0-9][0-9][0-9] (i.e., 10 digits in length, 1st and 4th are [2-9] all others are [0-9]. Any call that contains a character string of digits or letters that doesn't fully comply with E.164 formatting and the Local Exchange Routing Guide (LERG). This includes ANI / From fields with all digits of the same number, or anything less than 10 valid digits assigned from the NANP.
- d. INVALID DIGITS: The calling party number is numeric, but doesn't fit into a

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category defined above (i.e., all 1's, all 0's, partial entries <10 digits etc.).

e. INVALID ALPHA-NUMERICS: Invalid alphanumeric strings used to

misdirect, impersonate, disguise, or deceive SIP signaling.

For fraud prevention, detection, and mitigation, the carrier uses machine-learning technologies to detect voice network traffic anomalies, cost anomalies, and geographic traffic abnormalities in the fight against unlawful robocalls, as well as domestic and international toll fraud.

The filer certifies that it commits to respond to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls, and that none of the voice traffic that originates on its network is authenticated with STIR/SHAKEN, and that all of the voice traffic that originates on its network is subject to a robocall mitigation program.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on June 2nd 2025

Gil Zaidman, Director



Gil Zaidman

Director – DVASH-IT

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