

MDI Global LLC and its domestic affiliates (collectively, “MDI”) collectively are subject to a continuing extension of the June 5th, 2025 STIR/SHAKEN implementation date for those portions of its network that rely on technology that cannot initiate, maintain, and terminate SIP calls (“non-IP calls”) pursuant to Section 64.6304(d) of the Commission’s Rules.¹

As required to meet the criteria for that extension, MDI is participating in a working group that is developing a non-IP call authentication solution. MDI has been a leader within the technical standards community since the beginnings of STIR/SHAKEN development.

MDI commits to respond fully and in a timely manner 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 robo callers that use its service to originate calls. As a founding member of USTelecom – The Broadband Association’s (“USTelecom”) Industry Traceback Group (“ITG”) and a member of its executive committee, MDI has demonstrated its commitment to the ITG effort to traceback illegal calls to their source. MDI continues to be a leader in the responding to traceback requests and has both formal and informal ways for the Commission and enforcement agencies to engage with MDI. MDI will continue its cooperation with the Commission, law enforcement and the industry traceback consortium in investigating and stopping any illegal robocallers that use its service to originate calls.

ATTACHMENT A MDI ROBOCALL MITIGATION PROGRAM

MDI has taken the specific reasonable steps set forth in this attachment to avoid originating illegal robocall traffic as part of its robocall mitigation program. MDI is continuously analyzing the effectiveness of this program and reviewing best practices in this space. MDI reserves the right to modify and/or supplement the robocall mitigation measures included here to adapt to risks from bad actors and to improve the overall effectiveness of its program for the benefit of its customers.

- **Network Monitoring Practices.** MDI continuously monitors its networks for mass calling events and coordinates with other major providers, the ITG, trusted third parties, and key federal agencies to address and mitigate obviously fraudulent calls. In coordination with the ITG, MDI performs *Do Not Originate* (“DNO”) blocking of government impersonation calls. MDI also blocks “call back” *Direct Inward Dial* (“DID”) numbers used by such scams, including one-ring scams, and may block calls from numbers associated with mass robocalling scam campaigns as identified by a trusted third party. MDI stands ready to conduct additional network-level blocking in response to “cease-and-desist” letters issued by the Commission to the extent the recipients of those letters fail to undertake the directed remedial measures.
- **Know-Your-Customer Initiatives.** MDI employs a variety of “know-your-customer” initiatives to help mitigate the risk

that its customers would attempt to use MDI's network to initiate an illegal robocalling campaign. MDI makes reasonable, good faith efforts to validate the identity of its customers, particularly smaller customers that may be more susceptible to identify theft. These measures include, but are not limited to, performing a credit check; requiring customers to demonstrate that they are a legitimate business entity if they are not among the following: a Fortune 500 company, a public company, a state or federal government agency, or a major state university; and monitoring of financial position and payment performance. To comply with the Know Your Customer regulations set forth in the Patriot Act, all customers must be checked against the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC") list of Specially Designated Nationals ("SDN").

- **Contractual Terms and Other Conditions.** MDI's service agreements contain acceptable use and traffic integrity terms that prohibit using MDI's services for illegal purposes. Network capacity limitations also serve as a check against customers originating large volumes of calls, which are often hallmarks of illegal robocalling campaigns. Large and wholesale customers may also be subject to a review of their call counts, minutes, and target rates on a destination-by-destination basis. New and existing customers are also provided calling party hygiene standards that assist with preventing originating calls with invalid or malformed calling party information as applicable. Customers are also re-evaluated when they order new products or services.

MDI is committed to doing its part to combat illegal robocalls. As STIR/SHAKEN and other call authentication technology continues to be deployed across all networks, robocall mitigation programs play an important role to curtailing these annoying and harmful calls. MDI will continue to evaluate the effectiveness of its robocall mitigation program and, if warranted, may modify or supplement the measures identified here for the benefit of its customers.

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