



TurnDial LLC

STIR/SHAKEN Alignment & Robocall Mitigation Plan

Company Name:	TurnDial LLC
FCC Registration Number (FRN):	0028945525
Business Address:	1000 Germantown Pike, STE C4, Plymouth Meeting PA 19462
Compliance Contact:	Christian Boyer, cboyer@turn-dial.com , 484.655.1060
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***Upstream Carriers are Coredial and Viirtue

Coredial:(888) 543-2000, 295 Madison Ave, NYC NY 10017: FRN 15341902

Viirtue: (833) 844-7883, 401 16th St N, St. Petersburg, FL 33705: FRN 27109412

Section 1 – Certification

TurnDial LLC (“TurnDial”) is an interconnected VoIP provider. TurnDial does not operate its own network infrastructure and therefore does not directly implement the STIR/SHAKEN framework in the IP portions of its network, consistent with 47 CFR § 64.6305(d)(2)(i).

Instead, TurnDial ensures compliance by:

- Partnering exclusively with upstream carriers that have fully implemented STIR/SHAKEN.
- Passing attestations received from those carriers transparently.
- Maintaining a robust robocall mitigation program as required by the Federal Communications Commission (FCC).

TurnDial certifies that:

1. All calls it originates are subject to a robocall mitigation program.
2. TurnDial is not subject to any prohibition on filing and has not had any prior certification removed.
3. TurnDial will cooperate fully with traceback requests and law enforcement inquiries.

Section 2 – Robocall Mitigation Practices

TurnDial has implemented the following mitigation steps to prevent and combat the origination of unlawful robocalls:

1. Customer Vetting (Know Your Customer)

- Comprehensive onboarding reviews, including verification of business identity, ownership, and intended use cases.
- Screening of prospective and renewing customers against industry and regulatory watchlists.
- Refusal to provide services to customers suspected of engaging in unlawful calling practices.

2. Upstream Carrier Due Diligence

- TurnDial partners only with upstream providers who are STIR/SHAKEN compliant.
- TurnDial conducts periodic reviews to ensure wholesale partners maintain compliance.

3. Traffic Monitoring & Analytics

- Continuous monitoring of call patterns and volumes to detect anomalies.
- Use of fraud-detection tools to identify and investigate suspicious traffic.
- Immediate suspension of traffic associated with unlawful robocall behavior.

4. Policies & Contractual Controls

- Customer contracts explicitly prohibit the origination of illegal robocalls.
- Violations result in suspension or termination of service.

5. Traceback & Industry Cooperation

- TurnDial fully cooperates with the Industry Traceback Group (ITG).
- TurnDial responds promptly—within 24 hours—to traceback requests.

6. Compliance Oversight

- A designated compliance officer oversees mitigation activities.
- Regular internal reviews of mitigation procedures are conducted to ensure ongoing effectiveness.

Section 3 – Commitment Statement

TurnDial is committed to protecting the integrity of the voice network and to supporting the FCC's goals of eliminating illegal robocalls. While TurnDial does not control the IP network infrastructure necessary to directly implement STIR/SHAKEN, it aligns with the framework by working only with STIR/SHAKEN-enabled upstream carriers and by enforcing strict robocall mitigation measures on its customer base.

TurnDial will continue to adapt its practices as regulatory requirements and industry best practices evolve.

Signature


