

Robocall Mitigation Program Description

DIALCLI LLC

1. Overview

DIALCLI LLC is a United States-based Voice over IP (VoIP) communications provider incorporated in Wyoming. The company operates as a wholesale voice service provider originating SIP/VoIP calls and also serving verified business end-users. All calls originated on the DIALCLI network follow a robust robocall mitigation framework and comply with applicable regulations from the FCC.

2. STIR/SHAKEN Implementation

DIALCLI LLC certifies the following:

- The company has fully implemented the STIR/SHAKEN caller ID authentication framework across its entire VoIP network.
- All calls originated on the DIALCLI LLC network receive appropriate call attestation and are compliant with 47 CFR § 64.6301(a)(1) and (2).
- DIALCLI does not originate, complete, or transit calls using legacy TDM or non-STIR/SHAKEN-capable facilities.
- No Caller ID is permitted for outbound dialing unless it belongs to a verified business customer or number authorized under company CLI validation policies.

Therefore, DIALCLI LLC maintains **Complete STIR/SHAKEN Implementation** for all originated traffic.

3. Robocall Mitigation Procedures

DIALCLI enforces additional safeguards to prevent illegal robocalls, spoofing, and abusive voice traffic:

a. Customer Vetting (KYC)

- All onboarding customers must pass legal business identity verification, ownership validation, and address confirmation.
- Campaign traffic history (if available) is screened using analytics and reputation scoring.

- Government-recognized documents such as EIN confirmation and business records are collected before activation.

b. Traffic Monitoring & Anomaly Detection

- Active call traffic is monitored for:
 - Sudden high volume dialing spikes
 - Abnormal Answer-Seizure Ratio (ASR)
 - Short call duration patterns
 - Fraudulent or illegal robocall behavior scoring
 - Automated alerts flag suspicious patterns for investigation.

c. Call Blocking & Enforcement

- Any account showing illegal robocall or spoofing behavior is:
 - Instantly blocked
 - Suspended pending internal review
 - Terminated if violation is verified
 - DIALCLI cooperates with its carrier partners to permanently block abusive traffic sources.
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4. Traceback Cooperation & Response Commitment

DIALCLI LLC certifies:

- It will **respond fully within 24 hours** to all traceback requests from:
 - The FCC
 - Law enforcement agencies
 - The recognized U.S. industry traceback consortium
 - The company will fully cooperate in investigations and take immediate action to stop illegal callers using its network.
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5. No Prior Enforcement Actions

DIALCLI LLC attests that in the previous two (2) years:

- It has **not** been the subject of any formal Commission, law enforcement, or regulatory investigation or action involving actual or suspected wrongdoing related to:

- Illegal robocalls
 - Spoofing
 - Facilitating unlawful call traffic
 - No Robocall Mitigation Database certification has ever been removed or found deficient by regulatory mandate.
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6. Principals / Ownership Statement

Tina Laroia, CEO / Owner

No affiliates; No subsidiaries; No parent company

7. Official Robocall Mitigation Contact

Name: Tina Laroia

Title: CEO

Department: Sales

Street Address: 312 W 2ND ST, Casper, WY 82601, United States

8. Declaration

I certify, under penalty of perjury under the laws of the United States of America, that the foregoing Robocall Mitigation Program Description and related information provided by DIALCLI LLC is true, accurate, and complete.

Executed on: 12/04/2025

Officer e-Signature - TINA