

# Robocall Mitigation Plan

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## Dial Labs LLC

**FCC Registration Number (FRN):** 0037744430

**499 Filer ID:** 838372

**Date:** January 2025

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## 1. Introduction

Dial Labs LLC ("the Company") is committed to preventing illegal robocalls from originating on or transiting through its network. This Robocall Mitigation Plan outlines the reasonable steps the Company takes to avoid originating, transmitting, or facilitating illegal robocall traffic, in compliance with FCC regulations.

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## 2. STIR/SHAKEN Implementation

The Company is implementing STIR/SHAKEN call authentication on its IP network. The Company is in the process of obtaining its own STIR/SHAKEN certificate from an approved Certificate Authority and will sign all originated calls using its own certificate with appropriate attestation levels.

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## 3. Robocall Mitigation Measures

The Company implements the following robocall mitigation measures:

### **3.1 Proprietary AI-Based Detection System**

The Company utilizes a proprietary artificial intelligence mechanism for real-time detection and mitigation of illegal robocall traffic. Due to the novel nature of this technology and competitive considerations, specific technical details of the AI system remain confidential. This system provides advanced pattern recognition and anomaly detection capabilities that exceed traditional rule-based approaches.

### **3.2 Traceback Response**

The Company responds to all traceback requests from the Industry Traceback Group (ITG) and law enforcement within 24 hours of receipt. The Company cooperates fully with investigations into illegal robocall traffic.

### **3.3 Know Your Customer**

The Company performs due diligence on all customers before provisioning service, including: - Verification of business identity and legitimacy - Review of intended use of services - Contractual prohibitions against illegal robocalling

### **3.4 Contractual Prohibitions**

The Company's terms of service explicitly prohibit customers from: - Originating illegal robocalls - Spoofing caller ID with intent to defraud - Transmitting calls that violate the Telephone Consumer Protection Act (TCPA) - Using the service for any unlawful purpose

### **3.5 Traffic Monitoring**

The Company actively monitors traffic patterns for anomalies that may indicate illegal robocall campaigns, including: - Unusual call volume spikes - High short-duration call rates - Patterns consistent with robocall behavior - AI-driven behavioral analysis

### **3.6 Enforcement Actions**

Upon identification of illegal robocall traffic, the Company will: - Immediately block the offending traffic - Terminate service to customers originating illegal

calls - Report violations to appropriate authorities - Cooperate with law enforcement investigations

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## 4. Contact Information

### **Robocall Mitigation Contact:**

Name: Adrian Arnold Title: CEO Email: [adrian@dial-lab.io](mailto:adrian@dial-lab.io) Phone: 818-457-6932

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## 5. Certification

I certify that Dial Labs LLC has implemented the robocall mitigation measures described in this plan and is committed to preventing illegal robocalls from originating on its network.

**Signature:** *Adrian Arnold*

**Name:** Adrian Arnold

**Title:** CEO

**Date:** January 1, 2026