

Digital Telecom & Technologies LLC Robocall Mitigation Plan & Certification

I. Certification Statement

Digital Telecom & Technologies LLC hereby certifies the following to the Federal Communications Commission:

1. We have fully implemented and maintain a robocall mitigation program that complies with the requirements of 47 C.F.R. § 64.6305, applying to all traffic originating from or terminating to our network.
2. Neither Digital Telecom & Technologies LLC nor any of its affiliates, under common ownership or control, have been found in violation by the FCC or any law enforcement or regulatory agency concerning illegal robocalling, spoofing, or robocall mitigation-related misconduct.
3. We are filing this plan as a voice service provider operating under an extension for full STIR/SHAKEN implementation, as permitted under 47 C.F.R. § 64.6304.

II. STIR/SHAKEN Status & Caller ID Authentication

a. **Implementation Status:** As a provider with fewer than 100,000 subscriber lines, Digital Telecom & Technologies LLC is operating under a STIR/SHAKEN implementation extension. We are taking reasonable steps to implement the framework and will fully comply by the deadline applicable to our extension.

b. **Alternative Mitigation:** To protect our network and consumers during this period, we utilize a robust robocall mitigation program, as detailed in this plan, to prevent illegal robocall traffic.

c. **Caller ID Validation:** We enforce strict policies requiring subscribers to use only telephone numbers assigned by Digital Telecom & Technologies LLC or explicitly authorized for their use. We utilize third-party analytics and, where applicable, partner solutions like Aureon's Caller ID Authentication (CIDA) with Outbound Shield, to monitor, flag, and block calls originating from invalid, unallocated, or suspected spoofed numbers.

III. Know Your Customer (KYC) Policies

a. **Subscriber Verification:** We perform identity verification and collect legitimate service addresses for all new subscribers (residential, retail, and wholesale) at the point of onboarding.

b. **Enhanced Due Diligence:** Customers identified as higher-risk (e.g., outbound call centers, high-volume users) undergo enhanced application review and are subject to ongoing monitoring for anomalous calling patterns.

c. **Upstream Provider Vetting:** We only contract with intermediate and upstream providers

that are duly registered in the FCC's Robocall Mitigation Database. We collect and verify basic business information from all carrier partners.

IV. Network Monitoring & Illegal Traffic Mitigation

a. **Traffic Analysis:** We employ systems to monitor outbound call traffic in real-time for patterns indicative of illegal robocalling, such as excessive call volume, short call durations, and consumer complaint trends.

b. **Mitigation Actions:** Upon detecting suspicious activity, we promptly investigate. Confirmed illegal robocall traffic results in immediate action, including suspension or termination of the offending subscriber or carrier account, in accordance with our contractual obligations.

V. Traceback Cooperation

a. **Designated Contact:** We maintain a dedicated 24/7 point of contact for traceback requests. This contact information (name, title, address, phone, email) is accurately registered and kept current in the FCC's Robocall Mitigation Database, per 47 C.F.R. § 64.6305(d)(4)(v).

b. **Response Commitment:** We commit to responding completely to all traceback requests from the FCC, law enforcement, and the registered traceback consortium (e.g., USTelecom's Traceback Consortium) within 24 hours of receipt and will cooperate fully in all investigations.

VI. Contractual Enforcement

All subscriber and carrier agreements contain enforceable provisions that:

- Prohibit the origination of illegal robocalls and spoofing.
- Require full cooperation with traceback investigations.
- Reserve our right to terminate service for violations of these provisions or FCC robocall rules.

VII. Ongoing Compliance Commitment

Digital Telecom & Technologies LLC is committed to protecting consumers and upholding the integrity of its network. We will regularly review and update our policies, procedures, and technologies to ensure ongoing compliance with the TRACED Act and all relevant FCC regulations governing robocall mitigation.