

ROBOCALL GOVERNANCE AND CALL AUTHENTICATION POLICY



STIR/SHAKEN Framework

Dialora operates as a provider of voice communication services and supports approximately 100,000 subscriber voice lines. Based on this operational scale, Dialora qualifies for and utilizes a STIR/SHAKEN implementation extension in accordance with 47 CFR § 64.6304.

The majority of outbound call traffic transmitted over Dialora's network is authenticated through STIR/SHAKEN standards. Any calls that are not verified using this framework are handled under the robocall mitigation controls described below.

Robocall Monitoring and Mitigation Actions

Dialora has implemented network-level monitoring and fraud prevention systems designed to detect irregular or potentially unlawful robocall activity. These systems are configured to identify calls originating from invalid, unassigned, or non-operational caller identification numbers.

When such activity is detected, Dialora promptly blocks or restricts the affected call traffic and initiates an internal assessment to determine the source and nature of the issue. If the review confirms that a customer is attempting to place illegal robocalls, Dialora issues a formal directive requiring the customer to immediately cease such behavior. Continued non-compliance may result in suspension or termination of service.

Traceback Handling and Regulatory Cooperation

Dialora responds to traceback requests received from the Federal Communications Commission, law enforcement agencies, and the registered traceback consortium within 24 hours of receipt. Dialora cooperates fully with these entities to trace the origin of unlawful robocalls and prevent further misuse of its network.

Customer Verification and Usage Review

Dialora follows customer identity verification and screening practices aligned with the best practices recommended by the NANC Call Authentication Trust Anchor Working Group. During the onboarding process, Dialora evaluates each customer's intended service use and anticipated calling patterns, including whether high-volume outbound calling is expected. At present, Dialora does not provide service to customers whose primary business involves large-scale outbound calling operations.