

1. Overview of Services

Dish Factory Direct Inc is a non-facilities-based interconnected VoIP service provider operating as a white-label reseller of a third-party hosted voice platform.

The company does not operate switching infrastructure, session border controllers (SBCs), SIP trunks, or direct PSTN interconnections. All network infrastructure, call routing, interconnection, and STIR/SHAKEN implementation are provided by its underlying network provider and carrier partners.

Dish Factory Direct Inc provides hosted voice services exclusively to small business customers. The company does not serve call centers, outbound dialer operations, or high-volume telemarketing entities.

2. STIR/SHAKEN Implementation Status

STIR/SHAKEN authentication is implemented at the network level by the company's underlying network provider and its upstream carrier partners.

As a non-facilities-based reseller, Dish Factory Direct Inc does not independently sign calls but relies on its underlying provider for outbound call authentication in accordance with industry standards and FCC requirements.

Telephone numbers are provisioned through the hosted platform in compliance with applicable authentication and numbering authorization policies.

3. Robocall Mitigation Program

Although STIR/SHAKEN authentication is handled by the underlying network provider, Dish Factory Direct Inc maintains its own robocall mitigation policies focused on customer vetting, monitoring, and enforcement.

A. Customer Vetting (Know Your Customer Procedures)

Prior to provisioning service, Dish Factory Direct Inc:

- Verifies customer identity and business legitimacy
- Confirms lawful use of telephone numbers
- Requires acceptance of Terms of Service prohibiting illegal robocalling, spoofing, and fraudulent traffic

- Reviews intended service use to ensure it aligns with legitimate small business communications

The company does not provision services for high-volume outbound calling operations.

B. Monitoring & Enforcement

Dish Factory Direct Inc monitors customer accounts for suspicious activity, including:

- Abnormal outbound traffic patterns
- Excessive short-duration calls
- Complaints indicating potential spoofing or illegal robocalling

If suspicious activity is detected:

- Service may be immediately suspended
- Traffic may be blocked pending investigation
- Accounts may be terminated for violations

The company maintains authority to suspend or terminate service upon identification of illegal robocall activity.

C. Traceback Cooperation

Dish Factory Direct Inc fully cooperates with:

- The Industry Traceback Group (ITG)
- The Federal Communications Commission
- Law enforcement agencies

Traceback requests are reviewed promptly and responded to in accordance with applicable requirements.

4. Recordkeeping

The company maintains customer identity records, provisioning documentation, and call detail records as made available through the underlying platform.

Records are retained consistent with regulatory and operational requirements.

5. Ongoing Compliance

Dish Factory Direct Inc periodically reviews FCC guidance and industry best practices related to robocall mitigation and updates internal policies as necessary to maintain compliance.