

Robocall Mitigation Plan

I. Regulatory Background

The Telephone Robocall Abuse Criminal Enforcement and Deterrence Act (TRACED Act) requires voice service providers to implement STIR/SHAKEN authentication on Session Initiation Protocol ("SIP") traffic on carrier networks as well as to implement a Robocall Mitigation Plan ("RMP") covering non-SIP Time Division Multiplexing ("TDM") traffic.

Dual Path LLC serves as a provider of "voice service" as set forth in §64.6300(I) of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. §64.6300(I). Dual Path LLC's offerings include a range of voice services resold via PayG, LLC dba Skyswitch including Cloud Telephony, SIP Trunking, Hosted PBX, and VoIP services. Dual Path LLC services cater to businesses of all sizes, providing solutions for both inbound and outbound communications. Dual Path relies on our upstream/underlying provider, PayG, LLC dba Skyswitch, to sign calls on their network.

Dual Path LLC hereby submits this RMP to the Robocall Mitigation Database describing and confirming practices, policies, and procedures to mitigate unlawful robocalling, which include the following:

- (1) Dual Path LLC's specific reasonable steps to avoid originating illegal robocall traffic as part of this RMP;
- (2) Dual Path LLC's commitment to respond fully and timely to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperate with such entities in investigating and stopping any illegal robocallers using Dual Path LLC's service to originate calls; and,

II. Efforts to Avoid Originating Illegal Robocalls as Part of the Robocall Mitigation Program

As part of Dual Path LLC's RMP, **Dual Path LLC** provides the following affirmative, effective measures to help minimize the impact of illegal or unwanted robocalls, and prevent new and renewing customers from using **Dual Path LLC** to originate illegal calls:

- **Automatic Number Identification Management:** Dual Path LLC shall block originating telephone numbers if identified based upon patterns of activity.
- **Proactive Blocking.** Dual Path LLC requests our upstream provider, PayG, LLC dba Skyswitch, to block calls from phone numbers on Do-Not-Originate lists published by US Telecom and Neustar.
- **General Terms and Conditions.** Dual Path LLC prohibits customers from originating fraudulent calling using any fraudulent means, devices, or technologies. Dual Path LLC shall block or suspend the service of any customers originating unlawful robocalls through Dual Path LLC.
- **Underlying Network Provider.** Dual Path LLC works with our upstream/underlying provider, PayG, LLC dba Skyswitch, and supports the benefit of deploying systems to detect potential robocall activity relying upon statistics such as average call duration, ASR, and call count carrier/consumer reports. Dual Path LLC's confirms that our upstream/underlying carrier, PayG, LLC dba Skyswitch, maintains compliance with fully implemented STIR/SHAKEN protocols through the date of this RMP.

- **Traffic Reports and Industry Information.** Reports generated by Call Detail Record and pattern trends, fraud information sharing through industry organizations, and third-party notifications and complaints, may identify potential unlawful robocalling. Although no evidence exists suggesting **Dual Path LLC** in any way originates illegal robocall campaigns, in any instance where unlawful calling is identified, Dual Path LLC maintains contractual ability to take any action it deems necessary to eliminate the fraudulent activity.

III. Customer Vetting

Dual Path LLC maintains a comprehensive customer vetting process to meet “Know Your Customer” (“KYC”) obligations. This KYC vetting process provides an understanding of the nature of activities for any new and existing customers. Identifying and understanding customers through this KYC vetting process diminishes the opportunity to use Dual Path LLC’s network for spoofed or illegal traffic.

IV. Reliance on Underlying Providers

Dual Path LLC offers voice services to Customers relying upon the physical networks of underlying providers for call termination, call origination, 911 and assigning working telephone numbers. Dual Path LLC relies upon our underlying provider, PayG, LLC dba Skyswitch, to obtain the highest attestation levels possible with all voice calls.

V. Commitment to Responding to Traceback Requests

Dual Path LLC will respond fully and timely to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and to cooperating with such entities in investigating and stopping illegal robocallers using Dual Path LLC service to originate calls

VI. Company Information

- **Dual Path LLC** operates under the business name Dual Path Connected Solutions.
- **Dual Path LLC** ’s primary address is 2030 W Baseline Rd, #182-3997, Phoenix, AZ 85041
- **Dual Path LLC** is not a foreign provider.
- Robocall mitigation related issues can be directed to:

Dual Path LLC

support@dualpath.net

800-468-6851