



FCC Robocall Mitigation Plan

This Robocall Mitigation Plan outlines the framework, policies, and procedures that didXL has established to identify, prevent, and respond to unlawful robocalls, in accordance with FCC requirements and applicable industry standards.

1. Company Information

1.1. Business Information

Legal Name: didXL BV
Address: Bramenhof 9, 3862 WR Nijkerk, The Netherlands
Contact Name: Nils Oudejans
Title: Chief Executive Officer
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1.2. Executive Summary

didXL is a global wholesale provider of Direct Inward Dialing (DID), International Toll-Free Service (ITFS), and virtual phone numbers in over 160 countries. Since 2010, didXL has delivered numbering solutions that enable Cloud Communications, Contact Centers, Conferencing, and CPaaS applications.

didXL is committed to ensuring the integrity of the global telecommunications ecosystem by preventing unlawful robocalling activity. We proactively monitor, detect, and mitigate suspicious calling patterns, and we cooperate fully with industry traceback groups and regulators.

1.3. Corporate Structure & Affiliates

didXL is an independent private company. It has no parent corporation, subsidiaries, or affiliated entities that provide or resell telecommunications services in the United States. There are no common ownership arrangements with other voice service providers. Should this corporate structure change, didXL will update this plan and its Robocall Mitigation Database (RMD) filing accordingly.

1.4. Foreign Voice Service Provider

didXL operates as a Foreign Voice Service Provider, as defined under 47 CFR § 64.6300(c).

didXL provides voice service outside the United States and employs U.S.-based gateway providers to originate and terminate calls to and from the United States. didXL does not operate an IP-based network within the United States and does not originate calls itself. As such, didXL files this Robocall Mitigation Plan in accordance with FCC requirements for foreign voice service providers.

2. Scope and Objectives

This plan applies to all numbering and communication services provided by didXL in the USA. Its objectives are to:

- Prevent unlawful robocall activity originating from, or transiting through, didXL services.
- Identify and mitigate suspicious traffic patterns through proactive monitoring.
- Respond promptly and effectively to reports of robocalling from regulators, traceback entities, and industry stakeholders.
- Enforce compliance among customers through contractual measures, penalties, and service restrictions.
- Maintain ongoing compliance with applicable regulations, including FCC robocall mitigation requirements and industry best practices.

3. Roles and Responsibilities

3.1. Product Team

- Oversees implementation of the Robocall Mitigation Plan.
- Responds to traceback requests and regulator inquiries.

3.2. Account Managers / Support Team

- Conducts customer due diligence (KYC) and account audits.
- Performs direct outreach to all new customers as part of the onboarding process.
- Serves as the primary contact for compliance-related customer communications.

3.3. Technical Team

- Monitors customer traffic activity and escalates potential risks.
- Operates monitoring systems and automated alert mechanisms.
- Investigates anomalies, fraud alerts, and abuse reports on demand.
- Implements traffic blocks and corrective actions when required.

3.4. Compliance & Abuse Response Team

- Manages abuse case investigations and traceback responses.
- Coordinates with regulators, law enforcement, suppliers, and industry partners.
- Maintains records of enforcement actions and compliance outcomes.

4. Proactive Measures

4.1. Customer Onboarding and Know-Your-Customer (KYC)

- When signing up, customers are required to accept didXL Terms and Conditions and Privacy Policy.
- All new customers are contacted directly by an account manager.
- End users must submit valid and complete business documents.
- All documentation is manually verified before services are activated.
- Incomplete, inaccurate, or outdated documents are rejected.

4.2. Know-Your-Upstream Provider Procedures

didXL applies the following measures to identify and vet its upstream voice service providers and interconnecting carriers:

- *Supplier Vetting*: Before entering into a commercial relationship with any upstream provider,
- *Contractual Obligations*: All upstream provider agreements include representations and warranties that the upstream provider will not knowingly transmit illegal robocall traffic and will cooperate with traceback investigations.
- *Ongoing Monitoring*: didXL monitors traffic received from upstream providers for signs of illegal robocall activity, including anomalous call volumes, spoofed caller IDs, or traffic patterns inconsistent with legitimate use.
- *Escalation*: If an upstream provider is identified as a source of illegal robocall traffic, didXL will notify the provider, demand corrective action, and – if not remediated – suspend or terminate the upstream relationship.
- *Traceback Cooperation*: When traceback investigations identify upstream sources, didXL cooperates fully with the Industry Traceback Group and provides upstream provider information as permitted by applicable law.

4.3. Reseller and Downstream Responsibility

- Customers and resellers are contractually responsible for the conduct of their downstream customers and end users.
- Failure to cooperate with investigations or corrective actions may result in suspension, termination, or commercial restrictions.

4.4. Enhanced Due Diligence

- Additional verification measures applied to customers identified as higher risk.
- Escalation protocols for accounts exhibiting abnormal traffic activity.
- Ongoing account audits based on behavioral and usage indicators.

5. Reactive Measures

5.1. Abuse Case Management and Investigations

- didXL maintains a centralized abuse case management process to track complaints, investigations, actions taken, and outcomes.

- All abuse reports and traceback inquiries are reviewed promptly and handled according to defined internal response timelines.

5.2. Cooperation with Traceback Entities, the FCC, and Law Enforcement

didXL commits to the following:

- didXL will respond fully and promptly to all traceback requests from the FCC, the FTC, law enforcement agencies, and the Industry Traceback Group (ITG).
- didXL will cooperate fully with the FCC and ITG in investigating and stopping illegal robocallers, including providing call detail records, customer information, and upstream/downstream provider identification as required and as permitted by applicable law.
- didXL will implement any FCC-directed traffic-blocking or mitigation measures within the timeframes specified by the FCC.
- didXL will immediately notify the FCC and/or ITG upon discovering a significant source of illegal robocall traffic transiting its network.
- *Response timelines:* didXL targets acknowledgment of traceback requests within 24 hours.

5.3. Account Audits and Enforcement

- Comprehensive review of customer activity when suspicious or unlawful activity is detected.
- Enforcement of contractual terms, including suspension or termination of service.

5.4. Corrective and Disciplinary Actions

Depending on the severity of the violation, corrective measures may include:

- Issuance of a formal notice directing the customer to cease the activity.
- Blocking of specific number(s) associated with unlawful robocalls.
- Prohibition from purchasing additional numbers in specific jurisdictions.
- Global prohibition from purchasing numbers through didXL.
- Application of contractual penalties, including USD \$150 per verified abuse case, as submitted by regulators, authorities, or governmental institutions.

5.5. Law Enforcement & Emergency Response

- didXL immediately blocks traffic and/or numbering resources upon request from law enforcement or regulatory authorities.
- Customer and end-user information is disclosed securely and lawfully when required by competent authorities.
- Numbers involved in confirmed unlawful activity are permanently removed from service following investigation and enforcement actions.

6. Prior Law Enforcement or Regulatory Actions

Neither didXL BV nor any affiliated entity have been subject to any Federal Communications Commission (FCC) or other law enforcement agency action, investigation, or consent decree in the prior two years related to suspected involvement with illegal robocalling, caller ID spoofing,

or any deficiency in its Robocall Mitigation Database certification. Should this status change, this plan and the RMD filing will be promptly updated.

7. Ongoing Commitment to Compliance

didXL regularly reviews and updates its Robocall Mitigation Plan to align with evolving regulatory requirements and industry best practices.

Through a combination of robust onboarding, continuous monitoring, responsive enforcement, and industry cooperation, didXL remains fully committed to protecting the Public Switched Telephone Network (PSTN), upholding customer trust, and reducing unlawful robocalls.

This plan will be reviewed no less than annually and updated promptly upon any material change in didXL's operations, corporate structure, STIR/SHAKEN implementation status, or applicable regulatory requirements.