

DALCUDE DIGITAL LLC

FCC Robocall Mitigation & Compliance Framework

STIR/SHAKEN: FULLY IMPLEMENTED

CORPORATE PROFILE

Legal Entity	Dalcude Digital LLC
Jurisdiction	New Mexico, USA
Address	6500 Jefferson St NE, Suite 140, Albuquerque, NM 87109, USA
Website	Dalcude.com
Phone	+1 307-415-2467
Primary Email	matt.bennett@dalcude.com

FCC REGULATORY REGISTRATION

FCC RMD ID	RMD0039785
499 Filer ID	838935
Carrier OCN	460M
iconectiv Status	Active - Listed
Peering Partner	Peeringhub

1. Regulatory Statement & Scope

Dalcude Digital LLC ("Dalcude") has established this Robocall Mitigation Plan (RMP) in full compliance with the directives of the Federal Communications Commission (FCC) under 47 C.F.R. § 64.6300 et seq. As a registered communications provider operating under FCC 499 Filer ID 838935 and OCN 460M, Dalcude enforces technical and operational safeguards designed to prevent the origination, transit, and termination of illegal robocalls and spoofed voice traffic.

2. Customer Verification & Know Your Customer (KYC)

Dalcude enforces strict onboarding and identity verification protocols prior to granting network access or originating outbound voice traffic:

- Identity & Entity Validation:** Comprehensive verification of state incorporation records (New Mexico), physical office location in Albuquerque, NM, tax registration (EIN 42-2205229), and key operational personnel.
- Traffic Profile Auditing:** Review of expected calling patterns, campaign classifications, and verification that high-volume originators possess express written consent (TCPA compliance).

- **Contractual Enforcement:** Customer agreements mandate strict prohibition against illegal caller ID spoofing and grant Dalcude immediate termination rights for non-compliant traffic.

3. STIR/SHAKEN Protocol & Attestation Standard

Dalcude Digital LLC has Fully Implemented the STIR/SHAKEN call authentication framework across its SIP infrastructure:

- **Attestation Levels:** Full Attestation (Level A) is applied when Dalcude authenticates the originating customer and direct right-to-use for the telephone number. Partial (B) or Gateway (C) attestation is assigned strictly in accordance with FCC and STI-GA guidelines.
- **Certificate Authority Integration:** Direct alignment with approved Certificate Authorities utilizing Dalcude's active registration in the iconectiv Service Provider Registry.

4. Traffic Analytics & Proactive Robocall Prevention

Compliance Policy: Dalcude actively screens network traffic to detect and block illegal call patterns, unallocated ANI generation, and unauthorized high-frequency robocalling in real time. To ensure network integrity, Dalcude employs continuous automated monitoring:

1. **Behavioral Pattern Analysis:** Real-time detection of high burst volumes, unassigned/invalid caller IDs, low duration metrics, and high call-completion failures.
2. **Targeted Traffic Blocking:** Automated isolation and session termination for traffic streams exhibiting illegal spoofing characteristics.
3. **Do-Not-Originate (DNO) Lists:** Strict enforcement of industry DNO databases and invalid number blocks.

5. USTelecom ITG & Industry Traceback Cooperation

Dalcude is committed to full, rapid cooperation with the USTelecom Industry Traceback Group (ITG), the FCC, state Attorneys General, and law enforcement agencies:

- **24-Hour SLA Response:** Traceback requests are processed and responded to within a strict 24-hour window.
- **Upstream/Downstream Audit:** Complete capability to isolate source IP addresses, CDR logs, and customer identification for trace escalation.

6. Designated Regulatory & Operations Contacts

Role / Title	Contact Person	Direct Contact Information
Contract & Compliance Manager	Matthew Bennett	Email: matt.bennett@dalcude.com Phone: +1 307-415-2467
Compliance & Regulatory Contacts	Lucas Parker	lucas.parker@Dalcude.com

7. Executive Certification & Affirmation

I declare under penalty of perjury that I am an authorized officer of Dalcude Digital LLC and that I have examined this Robocall Mitigation Plan. The statements contained herein regarding network controls, STIR/SHAKEN implementation, and regulatory compliance under FCC RMD ID **RMD0039785** are true, correct, and actively enforced.

Matthew Bennett

Contract & Compliance Manager

Dalcude Digital LLC

Compliance & Legal Department | Regulatory Affairs Division