

DC Access, LLC (“DC Access”) is headquartered in Washington, D.C. and offers internet service within the District. In addition to Internet, DC Access also offers its customers Voice Over Internet Protocol (VoIP) services as a reseller of white-labeled services offered by White Label Communications, LLC (“White Label Communications”). DC Access does not control the softswitch, number porting or call trunking for the associated calls. Accordingly, DC Access does not have the facilities necessary to implement STIR/SHAKEN. DC Access has, however, adopted this robocall mitigation plan to establish procedures intended to limit the potential for the origination, carrying, or processing of unlawful robocalls from its voice services.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

DC Access follows the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity [NANC CallerID Best Practices](#).

This includes confirming the identity of DC Access’ customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers’ businesses.

DC Access’ services are targeted to small business usage. These customers are configured for service either off systems that cannot generate more than a single call at a time or are otherwise limited in the number of concurrent calls that would render an illicit robocalling platform from operating in a cost-effective manner.

II. CONTRACTUAL TERMS

Customers using DC Access’ services agree to abide by the rules and regulations set forth in our Terms of Service found on our website. ([VoIP Agreement - DC Access](#)). DC Access prohibits customers/subscribers from engaging in illegal activity, creating a false Caller ID (i.e., spoofing) or robocalling. Customers are informed that any suspicious activity will be investigated; and if the customer is engaging in, or has engaged in illegal robocalling, their service will be terminated.

III. TRACEBACK

DC Access commits to respond fully, within 24 hours, to all traceback requests from the Commission, law enforcement, and the Registered Traceback Consortium. In the event illegal robocallers use our system, DC Access will cooperate with such entities’ investigation.

IV. ROBOCALL MITIGATION

DC Access' underlying voice provider, White Label Communications, has committed to fully complying with Commission's robocall blocking requirements. White Label Communications has master service agreements with Bandwidth.com, Inteliquent, Telnyx, Peerless Networks, Level3/Lumen, VoIP Innovations, and ThinQ, and has received written assurances from these providers that they will sign calls submitted to their networks and will abide by the FCCs STIR/SHAKEN and robocall mitigation rules in all respects when providing voice services to White Label Communications. White Label and its upstream providers have also agreed to work together diligently to mitigate illegal robocalls, including cooperating fully when responding to traceback requests.

V. KNOW YOUR UPSTREAM PROVIDER

DC Access has an agreement in place with White Label Communications to resell their VoIP offering DC Access' customers. DC Access has confirmed that White Label Communications is listed in the Robocall Mitigation Database.

VI. PLAN UPDATES

DC Access will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.