

Robocall Mitigation Program Description

Filer: Andriy Dyogtyev, Sole Proprietor

Andriy Dyogtyev, a sole proprietor, is a reseller of voice services and provides voice services to its customers using the underlying network and technical infrastructure of its upstream provider, DIDWW. Andriy Dyogtyev does not operate its own switching platform or network facilities.

Andriy Dyogtyev has implemented a robocall mitigation program reasonably designed to prevent unlawful robocall traffic from originating on or passing through its service.

As part of this program, the filer:

1. Performs customer due diligence before activating service for new customers, including collecting and reviewing identifying and business information where applicable.
2. Monitors customer activity for unusual, suspicious, or potentially unlawful outbound calling patterns.
3. Investigates complaints, notices, traceback requests, and other credible information relating to suspected illegal robocalls.
4. Takes appropriate mitigation actions when warranted, including suspension or termination of service, traffic blocking, and cooperation with its upstream provider and relevant authorities.
5. Maintains policies and procedures reasonably designed to prevent customers from using its service to originate illegal calls.
6. Maintains records relevant to its operations and knows its upstream provider.
7. Commits to respond fully and within 24 hours to all lawful traceback requests, as required by FCC rules.

Where applicable, the filer relies on the underlying technical capabilities of its upstream provider.

STIR/SHAKEN Exemption Explanation

The filer is exempt from the STIR/SHAKEN implementation requirement because it lacks control over the network infrastructure necessary to implement STIR/SHAKEN.

The filer is a sole proprietor and reseller of voice services and does not operate its own switching platform, IP network, or other network facilities used to originate and authenticate calls. The filer provides service to customers using the underlying network and technical infrastructure of its upstream provider, DIDWW. Because the filer does not control the network infrastructure necessary to implement STIR/SHAKEN, the filer does not have a STIR/SHAKEN implementation obligation and therefore submits a robocall mitigation program instead.