

Robocall Mitigation Program

Best VoIP Dialer LLC

47 CFR § 64.6305 · TRACED Act | **FRN** 0038523411 · **OCN** 417M (IP Enabled Services)

1. Company Information

Legal Name: Best VoIP Dialer LLC

FCC Registration Number (FRN): 0038523411

Operating Company Number (OCN): 417M (IP Enabled Services)

Principal Business Address: 11425 Hufsmith Kuykendahl Road, Tomball, Texas 77375

Service Type: Voice Service Provider (originating) and Non-Gateway Intermediate Provider

Best VoIP Dialer LLC (the “Company”) provides VoIP origination to end-user and wholesale customers and transmits voice traffic between originating and terminating providers. The Company may update this Program at any time to reflect changes in its business, capabilities, and applicable law.

2. Purpose and Regulatory Authority

This Robocall Mitigation Program is established under 47 CFR § 64.6305, the TRACED Act, and FCC orders relating to STIR/SHAKEN and the Robocall Mitigation Database. Its purpose is to prevent, detect, mitigate, and remediate illegal, unwanted, and fraudulent robocalls transmitted through the Company’s network.

3. STIR/SHAKEN Implementation

The Company has obtained its own Service Provider Code (SPC) token and a digital certificate from an approved STI Certification Authority, maintains an active OCN, and authenticates traffic under the STIR/SHAKEN framework. Attestation reflects the Company’s actual knowledge of each call:

- **End-user traffic** is signed by the Company under Attestation A where the number is Company-assigned or the customer’s authorization is verified, and under Attestation B where the customer is verified but number-level authorization is not.
- **Authenticated reseller traffic** — already signed under the reseller’s own STIR/SHAKEN credentials — is passed through without altering the SIP Identity header.
- **Unauthenticated reseller traffic** is signed by the Company under Attestation C.

Caller IDs not assigned by the Company must be verified as authorized for the customer’s use before traffic is originated; unverified numbers are blocked. The Company keeps its RMD certification consistent with this status.

4. Roles

As an originating Voice Service Provider, the Company applies Know-Your-Customer due diligence, verifies customer identity and intended traffic, contractually prohibits illegal robocalling and unlawful spoofing, and monitors customer-originated traffic.

As a Non-Gateway Intermediate Provider for authenticated reseller traffic, the Company preserves the SIP Identity header, monitors transit traffic for abnormal patterns, and cooperates with upstream and downstream providers.

5. Know Your Customer and Onboarding

Before service activation, every customer completes the Company's KYC process, including: an executed Master Service Agreement with TCPA and Do-Not-Call obligations; a signed Acceptable Use Policy; a completed KYC questionnaire; a business-formation document and proof of good standing; proof of physical business address; government-issued identification of an authorized signatory; and an EIN where applicable.

Wholesale customers additionally provide their FCC Form 499 Filer ID, Robocall Mitigation Database listing, and USAC/Universal Service Fund registration. The Company verifies each wholesale customer by contacting the official email address and telephone number listed on that entity's Form 499 and RMD filings before activating service.

End-user customers provide business documentation as above; where an end user holds a Form 499 Filer ID or RMD listing, those are obtained and verified as well.

The Company reviews all documentation, may request additional information, and resolves any discrepancy before service begins. For any customer transmitting autodialed traffic, the Company first requires the identity of the entity on whose behalf calls are made, a sample script or recording, the ANIs to be used, proof of Do-Not-Call subscription, evidence of recipient consent where applicable, and the campaign's calls-per-second and dates.

6. Acceptable Use Policy

The Company enforces a strict Acceptable Use Policy. Customers contractually agree not to use the services for any illegal, fraudulent, deceptive, or abusive activity; for telemarketing in violation of the Telephone Consumer Protection Act (47 U.S.C. § 227) and FCC rules (47 C.F.R. § 64.1200), the FTC Telemarketing Sales Rule, the CAN-SPAM Act, or any federal or state Do-Not-Call law; or to transmit false or spoofed caller ID in violation of the Truth in Caller ID Act. Any violation authorizes immediate suspension or termination of service.

7. Traffic Filtering and Monitoring

Each customer trunk is protected by layered fraud and compliance filters: mandatory list scrubbing against the Federal Do-Not-Call Registry before dialing, with recommended scrubbing against the FCC Reassigned Numbers Database (reassigned.us); Do-Not-Originate (DNO) filtering; ANI validation against assigned and verified ranges; DNIS destination validation; restriction of wireless numbers as caller ID unless authorized; blocking of invalid, unallocated, or non-dialable numbers; flagging of calling patterns consistent with neighborhood spoofing; and reputation-based signals informed by third-party robocall-reputation and complaint data, including YouMail and FTC data. The Company monitors traffic in real time on its own switching infrastructure for abnormal volume, velocity, and calling patterns, and blocks suspected illegal traffic pending investigation.

8. Traceback Response and Enforcement

The Company responds to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG) as quickly as possible — typically within one to two (1-2) hours of receipt, and in every case within twenty-four (24) hours — and cooperates fully, providing all lawfully available information to identify the source of the traffic.

A traceback notice initiates an internal investigation; it is not, by itself, a determination that a customer has engaged in illegal activity. Where an issue is isolated or inadvertent — for example, a reassigned or honeypot number reached despite documented list scrubbing — the Company requires the customer to promptly remedy it, including removing the number and re-scrubbing its lists against the Do-Not-Call Registry and the FCC Reassigned Numbers Database. Where a customer is determined to be using the services for illegal robocalling, fails to take effective corrective action, or where the activity is willful, fraudulent, high-volume, or the customer does not respond to or cooperate with a traceback, the Company suspends or terminates service. The Company maintains a zero-tolerance policy toward illegal robocalling.

The Company may take one or more of the following actions as appropriate: requiring removal of offending numbers and re-scrubbing of calling lists; restricting capacity; blocking specific numbers or prefixes; suspending service pending review; terminating service; and notifying upstream or downstream providers and regulators. The Company reserves sole discretion to act immediately where the severity or volume of traffic warrants, and documents each investigation, determination, and action taken.

9. Record Retention

KYC and onboarding files, Master Service Agreements and AUP acknowledgments, Call Detail Records, traceback notices and responses, complaint records and investigation outcomes, and suspension and termination notices are retained for a minimum of two (2) years, or longer where required by applicable law.

10. Material Change and Annual Recertification

The Company will update its RMD certification and this Program within ten (10) business days of any material change to the information herein — including its legal name, ownership, address, or contacts; its STIR/SHAKEN implementation status; its mitigation procedures; or its services — and will review and recertify this Program annually.

11. Authorized Contacts

Compliance & Traceback: compliance@bestvoipdialer.com

Primary Technical Contact: Atif Yousaf — atif@bestvoipdialer.com — (346) 666-2674

Secondary Technical Contact: Khizar Hayat — khizar@bestvoipdialer.com — (786) 422-1997

Address: 11425 Hufsmith Kuykendahl Road, Tomball, Texas 77375

FRN: 0038523411

12. Certification

I, Khizar Hayat, in my capacity as Member and authorized representative of Best VoIP Dialer LLC, certify under penalty of perjury that the information set forth in this Robocall Mitigation Program is true and accurate to the best of my knowledge and belief, and that Best VoIP Dialer LLC has implemented the procedures described herein.

Signature:

A handwritten signature in dark ink, appearing to read "Khizar", is written over a light blue background.

Name: Khizar Hayat

Title: Member, Best VoIP Dialer LLC

Date: 06/30/2026

FRN: 0038523411